

FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1370639-0

Total Deleted Page(s) = 32  
Page 4 ~ b6; b7C; b7D; b7E;  
Page 5 ~ b6; b7C; b7D; b7E;  
Page 6 ~ b6; b7C; b7D; b7E;  
Page 10 ~ b7D; b7E;  
Page 11 ~ b7D; b7E;  
Page 12 ~ b7D; b7E;  
Page 13 ~ b7D; b7E;  
Page 14 ~ b7D; b7E;  
Page 15 ~ b7D;  
Page 18 ~ b6; b7C; b7D;  
Page 19 ~ b6; b7C; b7D;  
Page 20 ~ b6; b7C; b7D;  
Page 21 ~ b6; b7C; b7D;  
Page 22 ~ b6; b7C; b7D;  
Page 23 ~ b6; b7C; b7D;  
Page 24 ~ b6; b7C; b7D;  
Page 26 ~ b6; b7C;  
Page 27 ~ b6; b7C;  
Page 29 ~ b6; b7C; b7D;  
Page 30 ~ b6; b7C; b7D;  
Page 31 ~ b6; b7C; b7D;  
Page 32 ~ b6; b7C; b7D;  
Page 34 ~ b6; b7C; b7D;  
Page 35 ~ Referral/Direct;  
Page 36 ~ Referral/Direct;  
Page 37 ~ Referral/Direct;  
Page 38 ~ Referral/Direct;  
Page 39 ~ Referral/Direct;  
Page 40 ~ Referral/Direct;  
Page 42 ~ b6; b7C; b7D;  
Page 43 ~ b6; b7C; b7D;  
Page 44 ~ b6; b7C; b7D;

XXXXXXXXXXXXXXXXXXXXXXXXXXXXX  
X Deleted Page(s) X  
X No Duplication Fee X  
X For this Page X  
XXXXXXXXXXXXXXXXXXXXXXXXXXXXX

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

Precedence: ROUTINE

Date: 05/02/2012

To: Minneapolis  
Criminal Investigative

Attn: Public Corruption Unit  
SSA [redacted]

b6  
b7C

From: Minneapolis  
Squad SD-2 / Aberdeen RA  
Contact: SA [redacted]

Approved By: [redacted] *DMW*

b6  
b7C

Drafted By: *DMW* [redacted] tam 1

Case ID #: 194A-MP-NEW (Pending) *74612*  
188B-MP-73832-K (Pending)

Title: RICHARD BENDA, SD Economic Developer;

b6  
b7C

[redacted]  
STATE OF SOUTH DAKOTA - Victim;  
SIM, CSLPO

(X)  
*DMW*

Synopsis: [redacted]

b6  
b7C  
b7D  
b7E

Enclosure(s): [redacted]

b7D  
b7E

Details: On [redacted] SA [redacted] and SA [redacted]  
[redacted] Also present for  
this interview were [redacted]

b6  
b7C  
b7D  
b7E

UNCLASSIFIED

No victim Notification

Searched  
Serialized  
Indexed  
Filed

at this time  
SIM

*OTA to SA [redacted] upon CDC, ASAC, + SAC approval. DMW*  
*opened 5.16.12*

194A-MP-74612-1

b7D

NTP 018  
CPOE-SL  
OVA  
PC-PO

UNCLASSIFIED

To: Minneapolis From: Minneapolis  
Re: 194A-MP-NEW, 05/02/2012

[REDACTED]

b6  
b7C  
b7D  
b7E

[REDACTED]

b6  
b7C  
b7D  
b7E

[REDACTED]

b6  
b7C  
b7D  
b7E

[REDACTED]

b6  
b7C  
b7D  
b7E

From all of the aforementioned information contained in  
this EC, it is recommended that [REDACTED]

[REDACTED] it is  
also recommended that no victim notification be sent to the  
captioned victim. Because the captioned subjects [REDACTED]

b6  
b7C  
b7D  
b7E

UNCLASSIFIED

UNCLASSIFIED

To: Minneapolis From: Minneapolis  
Re: 194A-MP-NEW, 05/02/2012

[REDACTED] this matter  
is considered a Sensitive Investigative Matter (SIM).  
Minneapolis Division CDC [REDACTED] has reviewed this information  
and concurs with it's opening.

b6  
b7C  
b7D  
b7E

UNCLASSIFIED



UNCLASSIFIED

To: Minneapolis From: Minneapolis  
Re: 194A-MP-NEW, 05/02/2012

LEAD(s):

Set Lead 1: (Info)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

Read and clear.

♦♦

123tam02.ec

UNCLASSIFIED

b6  
b7C

1A's

1A-1

FD-340 (Rev. 4-11-03)

File Number 194A-MP-74662

Field Office Acquiring Evidence MP

Serial # of Originating Document \_\_\_\_\_

Date Received  b6  
b7C

From  b7D  
(vcc)

\_\_\_\_\_  
(Address)

\_\_\_\_\_  
(City and State)

By SA  b6  
b7C

To Be Returned ☐ Yes ☒ No

Receipt Given ☐ Yes ☒ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)  
Federal Rules of Criminal Procedure

☐ Yes ☒ No

Federal Taxpayer Information (FTI)

☐ Yes ☒ No

Title:

Reference:  302  
(Communication Enclosing Material)

\_\_\_\_\_  
b6  
b7C  
b7D

Description: ☒ Original notes re interview of

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
1A-1

FD-340b (Rev. 4-11-03)

File Number 194A-MP-74612

Field Office Acquiring Evidence MP

Serial # of Originating Document 97

Date Received 4/9/14

From   
(Name of Contributor/Interviewee)

(Address)

(City and State)

By

To Be Returned	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Receipt Given	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e) Federal Rules of Criminal Procedure		
	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Federal Taxpayer Information (FTI)	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Title:

Reference: FD-302  
(Communication Enclosing Material)

Description: ☒ Original notes re interview of

1 A 11

b6  
b7C

b6  
b7C

FD-340 (Rev. 4-11-03)

File Number

194A-MP-74612

Field Office Acquiring Evidence

Serial # of Originating Document

MP  
104

Date Received

From

By

SA

To Be Returned ☐ Yes

☒ No

Receipt Given ☐ Yes

☒ No

Grand Jury Material - Disseminate Only Pursuant to Rule 6 (e)  
Federal Rules of Criminal Procedure

☐ Yes

☒ No

Federal Taxpayer Information (FTI)

☐ Yes

☒ No

Title:

Richard Berda

1A13

Reference:

(Communication Enclosing Material)

Description:

☐ Original notes re interview of

b7D

- 1 -

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 04/26/2012

[redacted] white male, date of birth (DOB) [redacted]  
[redacted] Social Security Number (SSN) [redacted]  
[redacted] telephone number [redacted]  
[redacted] was interviewed at his residence. Also participating in  
the interview was [redacted]  
[redacted] After  
being advised of the identity of the interviewing agents and the  
nature of the interview, [redacted] voluntarily provided the  
following information:

b6  
b7C  
b7Db6  
b7C  
b7Db6  
b7C  
b7Db6  
b7C  
b7D

Investigation on [redacted]

at [redacted]

File # 194A-MP-74612 -3Date dictated 04/26/2012

by [redacted]

117tam01.302

b6  
b7C  
b7D

- 1 -

## FEDERAL BUREAU OF INVESTIGATION

Date of transcription 04/26/2012

[redacted] white male, date of birth (DOB) [redacted]  
[redacted] Social Security Number (SSN) [redacted]  
[redacted] telephone number [redacted]  
[redacted] was interviewed at his residence. Also participating in  
the interview was [redacted]  
[redacted] After  
being advised of the identity of the interviewing agents and the  
nature of the interview, [redacted] voluntarily provided the  
following information:

b6  
b7C  
b7D

[redacted]  
[redacted]

b6  
b7C  
b7D

[redacted]  
[redacted]

b6  
b7C  
b7D

[redacted]  
[redacted]

b6  
b7C  
b7D

Investigation on [redacted] at [redacted]

File # 194A-MP-74612 3 Date dictated 04/26/2012

by SA [redacted] 117tam01.302

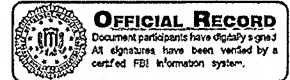
Searched

Serialized

Indexed

b6  
b7C  
b7D

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 02/28/2013

Title: (U)

b6 per EOUSA  
b7C per EOUSA

Approved By: SSRA

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -

Synopsis: (U)

b6 per EOUSA  
b7C per EOUSA

◆◆

*Serial 14*

UNCLASSIFIED



FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1370639-0

Total Deleted Page(s) = 148

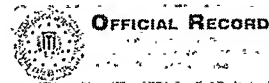
Page 1 ~ b7D;  
Page 2 ~ b6; b7C; b7D;  
Page 3 ~ b7D;  
Page 4 ~ b7D;  
Page 5 ~ b7D;  
Page 6 ~ b7D;  
Page 7 ~ b7D;  
Page 8 ~ b7D;  
Page 10 ~ b7D;  
Page 11 ~ b7D;  
Page 12 ~ b7D;  
Page 13 ~ b7D;  
Page 14 ~ b7D;  
Page 15 ~ b7D;  
Page 16 ~ b7D;  
Page 17 ~ b7D;  
Page 18 ~ b7D;  
Page 19 ~ b7D;  
Page 20 ~ b7D;  
Page 21 ~ b7D;  
Page 22 ~ b7D;  
Page 23 ~ b7D;  
Page 24 ~ b7D;  
Page 25 ~ b7D;  
Page 26 ~ b7D;  
Page 27 ~ b7D;  
Page 28 ~ b7D;  
Page 29 ~ b7D;  
Page 30 ~ b7D;  
Page 31 ~ b7D;  
Page 32 ~ b7D;  
Page 33 ~ b7D;  
Page 34 ~ b7D;  
Page 35 ~ b7D;  
Page 36 ~ b7D;  
Page 37 ~ b7D;  
Page 38 ~ b7D;  
Page 39 ~ b7D;  
Page 40 ~ b7D;  
Page 41 ~ b7D;  
Page 42 ~ b6; b7C; b7D;  
Page 43 ~ b7D;  
Page 44 ~ b7D;  
Page 45 ~ b7D;  
Page 46 ~ b6; b7C; b7D;  
Page 47 ~ b7D;  
Page 48 ~ b7D;  
Page 49 ~ b7D;

Page 50 ~ b7D;  
Page 51 ~ b7D;  
Page 52 ~ b7D;  
Page 53 ~ b7D;  
Page 54 ~ b7D;  
Page 55 ~ b7D;  
Page 56 ~ b7D;  
Page 57 ~ b7D;  
Page 59 ~ b6; b7C; b7D;  
Page 60 ~ b6; b7C; b7D;  
Page 61 ~ b6; b7C; b7D;  
Page 62 ~ b6; b7C; b7D;  
Page 63 ~ b6; b7C; b7D;  
Page 64 ~ b7D;  
Page 66 ~ b7D;  
Page 67 ~ b6; b7C; b7D;  
Page 68 ~ b6; b7C; b7D;  
Page 69 ~ b6; b7C; b7D;  
Page 70 ~ b6; b7C; b7D;  
Page 71 ~ b6; b7C; b7D;  
Page 72 ~ b6; b7C; b7D;  
Page 73 ~ b6; b7C; b7D;  
Page 74 ~ b7D;  
Page 76 ~ b6; b7C; b7D;  
Page 78 ~ b3; b6; b7C; b7D;  
Page 79 ~ b6; b7C; b7D;  
Page 80 ~ b6; b7C; b7D;  
Page 81 ~ b6; b7C; b7D;  
Page 82 ~ b6; b7C; b7D;  
Page 83 ~ b6; b7C; b7D;  
Page 84 ~ b6; b7C; b7D;  
Page 85 ~ b6; b7C; b7D;  
Page 86 ~ b6; b7C; b7D;  
Page 87 ~ b7D;  
Page 88 ~ b7D;  
Page 89 ~ b7D;  
Page 90 ~ b7D;  
Page 91 ~ b7D;  
Page 92 ~ b7D;  
Page 93 ~ b7D;  
Page 94 ~ b7D;  
Page 95 ~ b7D;  
Page 96 ~ b7D;  
Page 97 ~ b7D;  
Page 98 ~ b7D;  
Page 99 ~ b7D;  
Page 100 ~ b7D;  
Page 101 ~ b7D;  
Page 102 ~ b7D;  
Page 103 ~ b7D;  
Page 104 ~ b7D;  
Page 105 ~ b6; b7C; b7D;  
Page 106 ~ b6; b7C; b7D;  
Page 107 ~ b6; b7C; b7D;

Page 108 ~ b6; b7C; b7D;  
Page 109 ~ b7D;  
Page 110 ~ b7D;  
Page 111 ~ b7D;  
Page 112 ~ b6; b7C; b7D;  
Page 113 ~ b6; b7C; b7D;  
Page 114 ~ b7D;  
Page 115 ~ b6; b7C; b7D;  
Page 116 ~ b6; b7C; b7D;  
Page 117 ~ b7D;  
Page 118 ~ b7D;  
Page 119 ~ b6; b7C; b7D;  
Page 120 ~ b6; b7C; b7D;  
Page 121 ~ b6; b7C; b7D;  
Page 122 ~ b7D;  
Page 123 ~ b6; b7C; b7D;  
Page 124 ~ b6; b7C; b7D;  
Page 125 ~ b7D;  
Page 126 ~ b7D;  
Page 127 ~ b7D;  
Page 128 ~ b7D;  
Page 129 ~ b7D;  
Page 130 ~ b7D;  
Page 131 ~ b6; b7C; b7D;  
Page 132 ~ b6; b7C; b7D;  
Page 133 ~ b6; b7C; b7D; b7E;  
Page 134 ~ b7D;  
Page 135 ~ b6; b7C; b7D;  
Page 136 ~ b6; b7C; b7D;  
Page 137 ~ b6; b7C; b7D;  
Page 138 ~ b7D;  
Page 139 ~ b7D;  
Page 140 ~ b7D;  
Page 141 ~ b7D;  
Page 142 ~ b7D;  
Page 143 ~ b7D;  
Page 144 ~ b6; b7C; b7D;  
Page 145 ~ b6; b7C; b7D;  
Page 146 ~ b6; b7C; b7D;  
Page 147 ~ b7D;  
Page 148 ~ b6; b7C; b7D;  
Page 149 ~ b6; b7C; b7D;  
Page 150 ~ b7D;  
Page 151 ~ b7D;  
Page 152 ~ b7D;  
Page 153 ~ b7D;

XXXXXXXXXXXXXXXXXXXXXXXXXXXXX  
X Deleted Page(s) X  
X No Duplication Fee X  
X For this Page X  
XXXXXXXXXXXXXXXXXXXXXXXXXXXXX

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**

**Import Form**

Form Type: OTHER

Date: 08/29/2013

Title: (U) [redacted] - Original

b7D

Approved By: SSRA [redacted]

b6

Drafted By: [redacted]

b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) [redacted] - Original

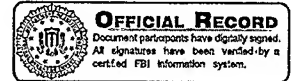
b7D

◆◆

UNCLASSIFIED

Serial 66

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 08/29/2013

Title: (U)

b7D

Approved By: SSRA

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U)

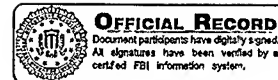
b7D

◆◆

UNCLASSIFIED

Serial 67

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**

**Import Form**

Form Type: OTHER

Date: 08/29/2013

Title: (U)

b7D

Approved By: SSRA

b6

Drafted By:

b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U)

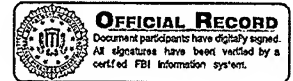
b7D

◆◆

UNCLASSIFIED

*Serial 68*

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 08/28/2013

Title: (U)

b7D

Approved By: SSRA

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U)

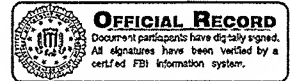
b7D

◆◆

UNCLASSIFIED

Serial 69

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 08/30/2013

Title: (U) Documents provided by

Approved By: SSRA

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) Documents provided by

♦♦

b6  
b7C  
b7D

b6  
b7C

b6  
b7C  
b7D

UNCLASSIFIED

Serial 70



FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1370639-0

Total Deleted Page(s) = 381

Page 7 ~ b7D; b7E;  
Page 8 ~ b7D; b7E;  
Page 9 ~ b7D; b7E;  
Page 10 ~ b7D; b7E;  
Page 11 ~ b7D; b7E;  
Page 12 ~ b7D; b7E;  
Page 13 ~ b7D; b7E;  
Page 14 ~ b7D; b7E;  
Page 15 ~ b7D; b7E;  
Page 16 ~ b7D; b7E;  
Page 17 ~ b7D; b7E;  
Page 18 ~ b7D; b7E;  
Page 19 ~ b7D; b7E;  
Page 20 ~ b7D; b7E;  
Page 21 ~ b7D; b7E;  
Page 22 ~ b7D; b7E;  
Page 23 ~ b7D; b7E;  
Page 24 ~ b7D; b7E;  
Page 25 ~ b7D; b7E;  
Page 26 ~ b7D; b7E;  
Page 27 ~ b7D; b7E;  
Page 28 ~ b7D; b7E;  
Page 29 ~ b7D; b7E;  
Page 30 ~ b7D; b7E;  
Page 31 ~ b7D; b7E;  
Page 32 ~ b7D; b7E;  
Page 33 ~ b7D; b7E;  
Page 34 ~ b7D; b7E;  
Page 35 ~ b7D; b7E;  
Page 36 ~ b7D; b7E;  
Page 37 ~ b7D; b7E;  
Page 38 ~ b7D; b7E;  
Page 39 ~ b7D; b7E;  
Page 40 ~ b7D; b7E;  
Page 41 ~ b7D; b7E;  
Page 42 ~ b7D; b7E;  
Page 43 ~ b7D; b7E;  
Page 44 ~ b7D; b7E;  
Page 45 ~ b7D; b7E;  
Page 46 ~ b7D; b7E;  
Page 47 ~ b7D; b7E;  
Page 48 ~ b7D; b7E;  
Page 49 ~ b7D; b7E;  
Page 50 ~ b7D; b7E;  
Page 51 ~ b7D; b7E;  
Page 52 ~ b7D; b7E;  
Page 53 ~ b7D; b7E;  
Page 54 ~ b7D; b7E;

Page 55 ~ b7D; b7E;  
Page 56 ~ b7D; b7E;  
Page 57 ~ b7D; b7E;  
Page 58 ~ b7D; b7E;  
Page 59 ~ b7D; b7E;  
Page 60 ~ b7D; b7E;  
Page 62 ~ b7D; b7E;  
Page 63 ~ b7D; b7E;  
Page 64 ~ b7D; b7E;  
Page 65 ~ b7D; b7E;  
Page 66 ~ b7D; b7E;  
Page 67 ~ b7D; b7E;  
Page 68 ~ b7D; b7E;  
Page 69 ~ b7D; b7E;  
Page 70 ~ b7D; b7E;  
Page 71 ~ b7D; b7E;  
Page 72 ~ b7D; b7E;  
Page 73 ~ b7D; b7E;  
Page 74 ~ b7D; b7E;  
Page 75 ~ b7D; b7E;  
Page 76 ~ b7D; b7E;  
Page 77 ~ b7D; b7E;  
Page 78 ~ b7D; b7E;  
Page 79 ~ b7D; b7E;  
Page 80 ~ b7D; b7E;  
Page 81 ~ b6; b7C; b7D; b7E;  
Page 82 ~ b7D; b7E;  
Page 83 ~ b7D; b7E;  
Page 84 ~ b6; b7C; b7D; b7E;  
Page 85 ~ b7D; b7E;  
Page 86 ~ b6; b7C; b7D; b7E;  
Page 87 ~ b6; b7C; b7D; b7E;  
Page 88 ~ b6; b7C; b7D; b7E;  
Page 89 ~ b7D; b7E;  
Page 90 ~ b6; b7C; b7D; b7E;  
Page 91 ~ b7D; b7E;  
Page 92 ~ b7D; b7E;  
Page 93 ~ b7D; b7E;  
Page 94 ~ b7D; b7E;  
Page 95 ~ b6; b7C; b7D; b7E;  
Page 96 ~ b6; b7C; b7D; b7E;  
Page 97 ~ b7D; b7E;  
Page 98 ~ b6; b7C; b7D; b7E;  
Page 99 ~ b7D; b7E;  
Page 100 ~ b7D; b7E;  
Page 101 ~ b6; b7C; b7D; b7E;  
Page 102 ~ b6; b7C; b7D; b7E;  
Page 103 ~ b6; b7C; b7D; b7E;  
Page 104 ~ b6; b7C; b7D; b7E;  
Page 105 ~ b6; b7C; b7D; b7E;  
Page 106 ~ b7D; b7E;  
Page 107 ~ b7D; b7E;  
Page 108 ~ b7D; b7E;  
Page 109 ~ b6; b7C; b7D; b7E;

Page 110 ~ b6; b7C; b7D; b7E;  
Page 111 ~ b6; b7C; b7D; b7E;  
Page 112 ~ b7D; b7E;  
Page 113 ~ b6; b7C; b7D; b7E;  
Page 114 ~ b6; b7C; b7D; b7E;  
Page 115 ~ b6; b7C; b7D; b7E;  
Page 116 ~ b7D; b7E;  
Page 117 ~ b6; b7C; b7D; b7E;  
Page 118 ~ b6; b7C; b7D; b7E;  
Page 119 ~ b6; b7C; b7D; b7E;  
Page 120 ~ b6; b7C; b7D; b7E;  
Page 121 ~ b7D; b7E;  
Page 122 ~ b6; b7C; b7D; b7E;  
Page 123 ~ b7D; b7E;  
Page 124 ~ b6; b7C; b7D; b7E;  
Page 125 ~ b7D; b7E;  
Page 126 ~ b6; b7C; b7D; b7E;  
Page 127 ~ b6; b7C; b7D; b7E;  
Page 128 ~ b6; b7C; b7D; b7E;  
Page 129 ~ b6; b7C; b7D; b7E;  
Page 130 ~ b6; b7C; b7D; b7E;  
Page 131 ~ b6; b7C; b7D; b7E;  
Page 132 ~ b6; b7C; b7D; b7E;  
Page 133 ~ b6; b7C; b7D; b7E;  
Page 134 ~ b6; b7C; b7D; b7E;  
Page 135 ~ b7D; b7E;  
Page 136 ~ b6; b7C; b7D; b7E;  
Page 137 ~ b7D; b7E;  
Page 138 ~ b6; b7C; b7D; b7E;  
Page 139 ~ b6; b7C; b7D; b7E;  
Page 140 ~ b7D; b7E;  
Page 141 ~ b6; b7C; b7D; b7E;  
Page 142 ~ b6; b7C; b7D; b7E;  
Page 143 ~ b6; b7C; b7D; b7E;  
Page 144 ~ b6; b7C; b7D; b7E;  
Page 145 ~ b6; b7C; b7D; b7E;  
Page 146 ~ b7D; b7E;  
Page 147 ~ b6; b7C; b7D; b7E;  
Page 148 ~ b7D; b7E;  
Page 149 ~ b6; b7C; b7D; b7E;  
Page 150 ~ b6; b7C; b7D; b7E;  
Page 151 ~ b6; b7C; b7D; b7E;  
Page 152 ~ b6; b7C; b7D; b7E;  
Page 153 ~ b6; b7C; b7D; b7E;  
Page 154 ~ b6; b7C; b7D; b7E;  
Page 155 ~ b6; b7C; b7D; b7E;  
Page 156 ~ b6; b7C; b7D; b7E;  
Page 157 ~ b6; b7C; b7D; b7E;  
Page 164 ~ b3; b6; b7C;  
Page 165 ~ Referral/Consult;  
Page 166 ~ Referral/Direct;  
Page 168 ~ b6; b7C; b7E;  
Page 169 ~ b6; b7C; b7E;  
Page 172 ~ b6; b7C;

Page 173 ~ b6; b7C;  
Page 175 ~ b6; b7C;  
Page 176 ~ b6; b7C;  
Page 179 ~ b7E;  
Page 180 ~ b7E;  
Page 181 ~ b7E;  
Page 182 ~ b7E;  
Page 183 ~ Referral/Consult;  
Page 184 ~ Referral/Direct;  
Page 186 ~ b6; b7C; b7E;  
Page 187 ~ b6; b7C; b7E;  
Page 188 ~ b6; b7C; b7E;  
Page 190 ~ b6; b7C; b7E;  
Page 191 ~ b7E;  
Page 192 ~ b7E;  
Page 193 ~ b7E;  
Page 194 ~ b7E;  
Page 195 ~ b7E;  
Page 196 ~ b7E;  
Page 197 ~ b6; b7C; b7E;  
Page 211 ~ Referral/Consult;  
Page 212 ~ Referral/Direct;  
Page 216 ~ Duplicate;  
Page 218 ~ b6; b7C; b7E;  
Page 219 ~ b6; b7C; b7E;  
Page 220 ~ b6; b7C; b7E;  
Page 221 ~ b6; b7C; b7E;  
Page 222 ~ Referral/Consult;  
Page 223 ~ Referral/Consult;  
Page 224 ~ Referral/Consult;  
Page 225 ~ Referral/Consult;  
Page 226 ~ Referral/Consult;  
Page 227 ~ Referral/Consult;  
Page 228 ~ Referral/Consult;  
Page 229 ~ Referral/Consult;  
Page 230 ~ Referral/Consult;  
Page 231 ~ Referral/Consult;  
Page 232 ~ Referral/Consult;  
Page 233 ~ Referral/Consult;  
Page 234 ~ Referral/Consult;  
Page 235 ~ Referral/Consult;  
Page 236 ~ Referral/Consult;  
Page 237 ~ Referral/Consult;  
Page 238 ~ Referral/Consult;  
Page 239 ~ Referral/Consult;  
Page 240 ~ Referral/Consult;  
Page 241 ~ Referral/Consult;  
Page 242 ~ Referral/Consult;  
Page 243 ~ Referral/Consult;  
Page 244 ~ Referral/Consult;  
Page 245 ~ Referral/Consult;  
Page 246 ~ Referral/Consult;  
Page 247 ~ Referral/Consult;  
Page 248 ~ Referral/Consult;

Page 249 ~ Referral/Consult;  
Page 250 ~ Referral/Consult;  
Page 251 ~ Referral/Consult;  
Page 252 ~ Referral/Consult;  
Page 253 ~ Referral/Consult;  
Page 254 ~ Referral/Consult;  
Page 255 ~ Referral/Consult;  
Page 256 ~ Referral/Consult;  
Page 257 ~ Referral/Consult;  
Page 258 ~ Referral/Consult;  
Page 259 ~ Referral/Consult;  
Page 260 ~ Referral/Consult;  
Page 261 ~ Referral/Consult;  
Page 262 ~ Referral/Consult;  
Page 263 ~ Referral/Consult;  
Page 264 ~ Referral/Consult;  
Page 265 ~ Referral/Consult;  
Page 266 ~ Referral/Consult;  
Page 267 ~ Referral/Consult;  
Page 268 ~ Referral/Consult;  
Page 269 ~ Referral/Consult;  
Page 270 ~ Referral/Consult;  
Page 271 ~ Referral/Consult;  
Page 272 ~ Referral/Consult;  
Page 273 ~ Referral/Consult;  
Page 274 ~ Referral/Consult;  
Page 275 ~ Referral/Consult;  
Page 276 ~ Referral/Consult;  
Page 277 ~ Referral/Consult;  
Page 278 ~ Referral/Consult;  
Page 279 ~ Referral/Consult;  
Page 281 ~ Referral/Consult;  
Page 282 ~ Referral/Consult;  
Page 283 ~ Referral/Consult;  
Page 284 ~ Referral/Consult;  
Page 285 ~ Referral/Consult;  
Page 286 ~ Referral/Consult;  
Page 287 ~ Referral/Consult;  
Page 288 ~ Referral/Consult;  
Page 289 ~ Referral/Consult;  
Page 290 ~ Referral/Consult;  
Page 291 ~ Referral/Consult;  
Page 292 ~ Referral/Consult;  
Page 293 ~ Referral/Consult;  
Page 294 ~ Referral/Consult;  
Page 295 ~ Referral/Consult;  
Page 296 ~ Referral/Consult;  
Page 297 ~ Referral/Consult;  
Page 298 ~ Referral/Consult;  
Page 299 ~ Referral/Consult;  
Page 300 ~ Referral/Consult;  
Page 301 ~ Referral/Consult;  
Page 302 ~ Referral/Consult;  
Page 303 ~ Referral/Consult;

Page 304 ~ Referral/Consult;  
Page 305 ~ Referral/Consult;  
Page 306 ~ Referral/Consult;  
Page 307 ~ Referral/Consult;  
Page 308 ~ Referral/Consult;  
Page 309 ~ Referral/Consult;  
Page 310 ~ Referral/Consult;  
Page 311 ~ Referral/Consult;  
Page 312 ~ Referral/Consult;  
Page 313 ~ Referral/Consult;  
Page 314 ~ Referral/Consult;  
Page 315 ~ Referral/Consult;  
Page 316 ~ Referral/Consult;  
Page 317 ~ Referral/Consult;  
Page 318 ~ Referral/Consult;  
Page 319 ~ Referral/Consult;  
Page 320 ~ Referral/Consult;  
Page 321 ~ Referral/Consult;  
Page 322 ~ Referral/Consult;  
Page 323 ~ Referral/Consult;  
Page 324 ~ Referral/Consult;  
Page 325 ~ Referral/Consult;  
Page 326 ~ Referral/Consult;  
Page 327 ~ Referral/Consult;  
Page 328 ~ Referral/Consult;  
Page 329 ~ Referral/Consult;  
Page 330 ~ Referral/Consult;  
Page 331 ~ Referral/Consult;  
Page 332 ~ Referral/Consult;  
Page 333 ~ Referral/Consult;  
Page 334 ~ Referral/Consult;  
Page 335 ~ Referral/Consult;  
Page 336 ~ Referral/Consult;  
Page 337 ~ Referral/Consult;  
Page 338 ~ Referral/Consult;  
Page 339 ~ Referral/Consult;  
Page 340 ~ Referral/Consult;  
Page 341 ~ Referral/Consult;  
Page 342 ~ Referral/Consult;  
Page 343 ~ Referral/Consult;  
Page 344 ~ Referral/Consult;  
Page 345 ~ Referral/Consult;  
Page 346 ~ Referral/Consult;  
Page 347 ~ Referral/Consult;  
Page 348 ~ Referral/Consult;  
Page 349 ~ Referral/Consult;  
Page 350 ~ Referral/Consult;  
Page 351 ~ Referral/Consult;  
Page 352 ~ Referral/Consult;  
Page 353 ~ Referral/Consult;  
Page 354 ~ Referral/Consult;  
Page 355 ~ Referral/Consult;  
Page 356 ~ Referral/Consult;  
Page 357 ~ Referral/Consult;

Page 358 ~ Referral/Consult;  
Page 359 ~ Referral/Consult;  
Page 360 ~ Referral/Consult;  
Page 361 ~ Referral/Consult;  
Page 362 ~ Referral/Consult;  
Page 363 ~ Referral/Consult;  
Page 364 ~ Referral/Consult;  
Page 365 ~ Referral/Consult;  
Page 366 ~ Referral/Consult;  
Page 367 ~ Referral/Direct;  
Page 368 ~ Referral/Direct;  
Page 369 ~ Referral/Direct;  
Page 386 ~ b3;  
Page 387 ~ b3; b6; b7C;  
Page 393 ~ b3; b6; b7C;  
Page 404 ~ b3;  
Page 405 ~ b3; b6; b7C;  
Page 406 ~ b3;  
Page 409 ~ b6; b7C; b7D;  
Page 415 ~ b6; b7C; b7E;  
Page 417 ~ b7D;  
Page 418 ~ b7D;  
Page 419 ~ b7D;  
Page 420 ~ b7D;  
Page 421 ~ b7D;  
Page 422 ~ b7D;  
Page 423 ~ b7D;  
Page 424 ~ b7D;  
Page 425 ~ b7D;  
Page 426 ~ b7D;  
Page 427 ~ b7D;  
Page 428 ~ b7D;  
Page 429 ~ b7D;  
Page 430 ~ b7D;  
Page 431 ~ b7D;  
Page 432 ~ b7D;  
Page 433 ~ b7D;  
Page 434 ~ b7D;  
Page 435 ~ b7D;  
Page 436 ~ b7D;  
Page 437 ~ b7D;  
Page 438 ~ b7D;  
Page 439 ~ b7D;  
Page 440 ~ b7D;  
Page 441 ~ b7D;  
Page 442 ~ b7D;  
Page 443 ~ b7D;  
Page 444 ~ b7D;  
Page 445 ~ b7D;  
Page 446 ~ b7D;  
Page 447 ~ b7D;  
Page 448 ~ b7D;  
Page 449 ~ b7D;  
Page 450 ~ b6; b7C; b7D;

Page 451 ~ b6; b7C; b7D;  
Page 452 ~ b7D;  
Page 453 ~ b7D;  
Page 454 ~ b7D;  
Page 455 ~ b6; b7C; b7D;  
Page 456 ~ b7D;  
Page 457 ~ b7D;  
Page 458 ~ b7D;  
Page 459 ~ b7D;

XXXXXXXXXXXXXXXXXXXXXXXXXXXXX  
X Deleted Page(s) X  
X No Duplication Fee X  
X For this Page X  
XXXXXXXXXXXXXXXXXXXXXXXXXXXXX



UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
4 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

Serial 4

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
5 FROM 194A-MP-74612 INTO 318B-MP-2915757

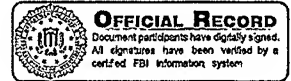
♦♦

STUB

*Serial 5*

UNCLASSIFIED

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Electronic Communication**

**Title:** (U) Request to travel to Indianapolis  
Division.

**Date:** 09/06/2012

**To:** INDIANAPOLIS (SAC)

[Redacted]

**From:** MINNEAPOLIS

**Contact:**

[Redacted]

**Approved By:**

[Redacted]

**Drafted By:**

[Redacted]

**Case ID #:** 194A-MP-74612 (U) BENDA, RICHARD -

**Synopsis:** (U) Request to travel to Indianapolis Division.

[Redacted]

**Details:**

[Redacted]

[Redacted]

SA [Redacted] of the Bloomington RA has assisted writer in  
determining that [Redacted] listed  
above.

[Redacted]

UNCLASSIFIED

*Serial 6*

b6  
b7C

b7E

b6  
b7C  
b7E

b6  
b7C  
b7E

b7E

UNCLASSIFIED

Title: (U) Request to travel to Indianapolis Division.

Re: 194A-MP-74612, 09/06/2012

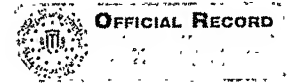
[redacted] are not easily communicated in a lead, writer plans to travel to the Indianapolis Division during the week of [redacted] to attempt to locate and interview [redacted]. Therefore, Minneapolis Division requests concurrence of SAC Indianapolis with travel of SA [redacted] to Indianapolis.

b6  
b7C  
b7E

♦♦

UNCLASSIFIED

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**

**Import Form**

Form Type: OTHER

Date: 01/11/2013

Title: (U)

b7D  
b7E

Approved By: SSRA

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612 (U) BENDA, RICHARD -

Synopsis: (U)

b7D  
b7E

♦♦

*Serial 7*

UNCLASSIFIED

UNCLASSIFIED



OFFICIAL RECORD

# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 01/11/2013

Title: (U)

b7D

b7E

Approved By: SSRA

Drafted By:

b6

b7C

Case ID #: 194A-MP-74612 (U) BENDA, RICHARD -

Synopsis: (U)

b7D

b7E

♦♦

UNCLASSIFIED

*Serial 8*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: FD-302

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
9 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 9*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: FD-302

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
10 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

*Serial 10*

UNCLASSIFIED



UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: FD-302

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
11 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

*Serial 11*

UNCLASSIFIED

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: FD-302

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
12 FROM 194A-MP-74612 INTO 318B-MP-2915757

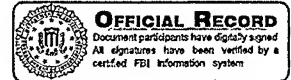
♦♦

STUB

UNCLASSIFIED

*Serial 12*

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**

**Import Form**

Form Type: OTHER

Date: 02/28/2013

Title: (U) FGJ Subpoena for

b3

Approved By: SSRA

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612 (U) BENDA, RICHARD -

Synopsis: (U) GJ Subpoena for

b3

◆◆

UNCLASSIFIED

*Serial 13*

**United States District Court**  
DISTRICT OF SOUTH DAKOTA

TO:

2012R00460-03

**SUBPOENA TO TESTIFY  
BEFORE GRAND JURY**

b3

SUBPOENA FOR:

☐ PERSON ☒ DOCUMENTS OR OBJECT(S)

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE: United States Courthouse 400 South Phillips Avenue Sioux Falls, SD 57104	DATE AND TIME: <div></div>
--	-------------------------------

b3

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

SEE ATTACHMENT.

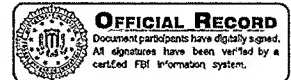
☐ Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the Court or by an officer acting on behalf of the Court.

CLERK: JOSEPH HAAS	DATE: <div></div>
(BY) DEPUTY CLERK: <div></div>	
This subpoena is issued upon application of the United States of America.	NAME ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY <div></div> 325 South First Avenue, Suite 300 Sioux Falls, SD 57104 <div></div>

b3  
b6  
b7C

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**

**Import Form**

Form Type: OTHER

Date: 02/28/2013

Title: (U) Interview of

b6  
b7C

Approved By: SSRA

Drafted By:

b6  
b7C

Case ID #: 194A-MP-74612 (U) BENDA, RICHARD -

Synopsis: (U) Telephonic Interview of

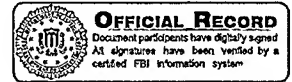
b6  
b7C

◆◆

UNCLASSIFIED

*Serial 15*

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Electronic Communication

Title: (U) Case to be presented [redacted]  
[redacted]

Date: 03/01/2013

b3

From: MINNEAPOLIS

MP-SD-2

Contact: [redacted]

Approved By: [redacted]

b6  
b7C

Drafted By: [redacted]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -

Synopsis: (U) Case to be presented [redacted]  
[redacted]

b3

b7E

Details:

[redacted]

[redacted]

[redacted]

b3  
b6  
b7C  
b7E

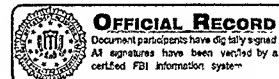
[redacted]

b7E

♦♦

*Serial 16*

UNCLASSIFIED



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 02/12/2013

[redacted] white male, [redacted]  
[redacted] date of birth (DOB) [redacted] Social  
Security Number (SSN) [redacted]  
[redacted] telephone number [redacted] was interviewed at his  
employment, [redacted] Also  
participating in the interview was [redacted]

b6  
b7C

[redacted]  
[redacted] After being advised of the  
identity of the interviewing agents and the nature of the interview, [redacted]  
provided the following information:

b6  
b7Cb6  
b7C

Investigation on [redacted] at [redacted] (In Person)

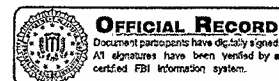
File # 194A-MP-74612Date drafted 01/11/2013

by [redacted]

b6  
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Serial 17



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 03/26/2013

[redacted]  
[redacted] was interviewed at his office in [redacted]  
[redacted] Also present during the interview was [redacted]  
[redacted]  
Also participating in this interview was [redacted]  
[redacted] After being advised of the  
identities of the interviewing agents and the nature of the interview,  
[redacted] provided the following information:

b6  
b7C

[redacted]  
[redacted]

b6  
b7C

[redacted]

b6  
b7C

[redacted]

b6  
b7C

Investigation on [redacted] at [redacted] (In Person)  
File # 194A-MP-74612 Date drafted 03/26/2013  
by [redacted]

b6  
b7C

Serial 18



UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: EC (FD-1057)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
19 FROM 194A-MP-74612 INTO 318B-MP-2915757

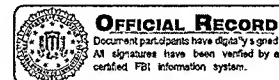
♦♦

STUB

UNCLASSIFIED

*Serial 19*

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 05/06/2013

Title: (U)

b7E

Approved By: SSRA

Drafted By:

b6

b7C

Case ID #: 194A-MP-74612 (U) BENDA, RICHARD -

Synopsis: (U)

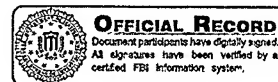
b7E

◆◆

UNCLASSIFIED

*Serial 20*

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: EMAIL

Date: 05/06/2013

b7E

Title: (U)

Approved By: SSRA

b6

b7C

Drafted By:

Case ID #: 194A-MP-74612 (U) BENDA, RICHARD -

Synopsis: (U)

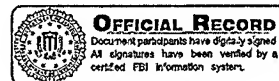
b7E

◆◆

UNCLASSIFIED

*Serial 22*

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**

**Import Form**

Form Type: OTHER

Date: 05/16/2013

Title: (U)

b7E

Approved By: SSA

b6

b7C

Drafted By:

Case ID #: 194A-MP-74612 (U) BENDA, RICHARD -

Synopsis: (U)

b6

b7C

b7E

◆◆

UNCLASSIFIED

*Serial 23*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
24 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 24*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
25 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 25*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
26 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 26*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
27 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 27*



UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
28 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 28*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
29 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 29*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
30 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 30*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
31 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 31*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
32 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

UNCLASSIFIED

*Serial 32*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION**

**Serial Moved to Another Case**

Action Performed By:

Action Date: 07/25/2013

b6  
b7C

Original Form Type: OTHER (Import)

From Case ID #: 194A-MP-74612

To Case ID #: 318B-MP-2915757

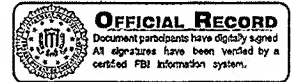
Justification: Move to another case (Incorrect Filing): TRANSFER SERIAL  
33 FROM 194A-MP-74612 INTO 318B-MP-2915757

♦♦

STUB

*Serial 33*

UNCLASSIFIED



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 06/24/2013

[redacted] white male, date of birth (DOB) [redacted] Social Security Number (SSN) [redacted]  
[redacted] telephone number [redacted] was interviewed at [redacted]  
[redacted] Also participating in the interview was [redacted] Also  
present during the interview was [redacted] was advised that  
the interview was completely voluntary. After being advised of the  
identity of the interviewing agents and the nature of the interview,  
[redacted] provided information which was fully recorded on a digital  
recorder of [redacted] was advised that the  
interview would be recorded and agreed to it's recording. Refer to this  
recording and it's transcript for any details related to this interview.

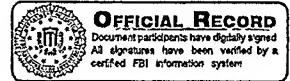
b6  
b7C*Serial 34*

Investigation on [redacted] at [redacted] United States (In Person)

File # 194A-MP-74612Date drafted 06/24/2013

by [redacted]

b6  
b7C



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 06/24/2013

[redacted] white female, date of birth (DOB) [redacted] Social Security Number (SSN) [redacted] was interviewed at [redacted]

[redacted] Also participating in the interview was [redacted] Also present during the interview was [redacted] telephone number [redacted] was advised that the interview was completely voluntary. After being advised of the identity of the interviewing agents and the nature of the interview, [redacted] provided information which was fully recorded on a digital recorder of [redacted] [redacted] were advised that the interview would be recorded and agreed to its recording. Refer to this recording and its transcript for any details related to this interview.

b6  
b7C*Serial 35*

Investigation on [redacted] at [redacted] United States (In Person)

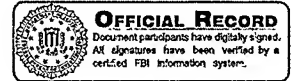
File # 194A-MP-74612

Date drafted 06/24/2013

by [redacted]

b6  
b7C





## FEDERAL BUREAU OF INVESTIGATION

Date of entry 06/24/2013

[redacted] white male, date of birth (DOB) [redacted] Social Security  
Number (SSN) [redacted]  
[redacted] was interviewed at [redacted]  
[redacted] Also participating in  
the interview was [redacted]  
[redacted] Also present during the interview was [redacted]  
[redacted] telephone number [redacted]

b6  
b7C

was advised that the interview was completely voluntary. After being  
advised of the identity of the interviewing agents and the nature of the  
interview, [redacted] provided information which was fully recorded on a  
digital recorder of [redacted] were  
advised that the interview would be recorded and agreed to it's recording.

Refer to this recording and it's transcript for any details related to  
this interview.

*Serial 36*

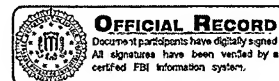
Investigation on [redacted] at [redacted] United States (In Person)

File # 194A-MP-74612Date drafted 06/24/2013

by [redacted]

b6  
b7C

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: EMAIL

Date: 06/24/2013

Title: (U) Emails from [REDACTED]

Approved By: SSRA [REDACTED]

b6  
b7C

Drafted By: [REDACTED]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) Emails from [REDACTED] regarding [REDACTED]  
[REDACTED]

b6  
b7C

◆◆

UNCLASSIFIED

Serial 38

[redacted] (MP) (FBI)

From: [redacted] (MP) (FBI)  
Sent: Tuesday, June 18, 2013 2:52 PM  
To: [redacted] (MP) (FBI)  
Cc: [redacted] (MP) (FBI)  
Subject: 194E Case --- UNCLASSIFIED

b6  
b7C

Classification: UNCLASSIFIED  
=====

[redacted]  
[redacted]

[redacted]

b6  
b7C  
b7D

[redacted]

[redacted]

Sioux Falls, South Dakota RA

Office: [redacted]

Blackberry: [redacted]

b6  
b7C

=====  
Classification: UNCLASSIFIED

[redacted] (MP) (FBI)

**From:** [redacted] (MP) (FBI)  
**Sent:** Thursday, June 20, 2013 10:30 AM  
**To:** [redacted] (MP)(FBI); [redacted] (MP) (FBI)  
**Subject:** RE: Question --- UNCLASSIFIED

b6  
b7C

Classification: UNCLASSIFIED  
=====

[redacted]

b6  
b7C

**From:** [redacted] (MP)(FBI)  
**Sent:** Thursday, June 20, 2013 10:27 AM  
**To:** [redacted] (MP) (FBI); [redacted] (MP) (FBI)  
**Subject:** RE: Question --- UNCLASSIFIED

b6  
b7C

Classification: UNCLASSIFIED  
=====

[redacted]

b6  
b7C  
b7E

**From:** [redacted] (MP) (FBI)  
**Sent:** Thursday, June 20, 2013 10:23 AM  
**To:** [redacted] (MP) (FBI)  
**Cc:** [redacted] (MP)(FBI)  
**Subject:** Question --- UNCLASSIFIED

b6  
b7C

Classification: UNCLASSIFIED  
=====

[redacted]

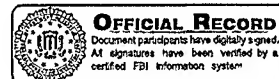
b6  
b7C

[redacted]

[redacted]  
Sioux Falls, South Dakota RA  
Office: [redacted]  
Blackberry: [redacted]

b6  
b7C

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**  
**Electronic Communication**

Title: (U) Benda investigation update

Date: 07/17/2013

From: MINNEAPOLIS

MP-SD-2

Contact: [REDACTED]

Approved By: SSRA [REDACTED]

b6  
b7C

Drafted By: [REDACTED]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) To provide update in investigation.

[REDACTED]

b7E

## Details:

On 11/03/2011, in Minneapolis, Minnesota, SA [REDACTED] and SA

[REDACTED] met with [REDACTED]

During this interview, [REDACTED]

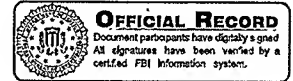
b6  
b7C  
b7E

UNCLASSIFIED

Serial 39

1 JIM FLANAGAN: Yeah, and--  
2 TED MILLER: Now one of the things that I've heard is that, you know, the  
3 plant that you wanted to start, Dennis, was going to process a certain amount  
4 of head per day to be efficient, be productive. But from what I understand  
5 the State wanted it much bigger?  
6 DENNIS HELLWIG: No.  
7 TED MILLER: No? Okay.  
8 NORG SANDERSON: The State couldn't know. They couldn't figure out a beef  
9 plant if you asked them.  
10 JIM FLANAGAN: They just wanted Certified Beef done.  
11 NORG SANDERSON: They just wanted a processing plant, but they wanted to be a  
12 part of it.  
13 JIM FLANAGAN: Right.  
14 NORG SANDERSON: You know what I mean?  
15 JIM FLANAGAN: Okay. Now...  
16 NORG SANDERSON: This is political, this is all political. It's got nothing to  
17 do with money or it's got--  
18 JIM FLANAGAN: And that's exactly what I want to get into is the nature of the  
19 thing. So I'm not talking about--I want to know about you, did you have any  
20 specific conversations with Benda about this stuff?  
21 NORG SANDERSON: No.  
22 JIM FLANAGAN: No. Just when you were attending one with Dennis and the  
23 conversation--  
24 NORG SANDERSON: Yeah.  
25

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**

**Import Form**

Form Type: OTHER

Date: 07/18/2013

Title: (U)  Subpoena

b3

Approved By: SSRA

Drafted By:

b6  
b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U)  Subpoena for

b3  
b6  
b7C

♦♦

UNCLASSIFIED

Serial 44

# United States District Court

DISTRICT OF SOUTH DAKOTA

TO:

## SUBPOENA TO TESTIFY BEFORE GRAND JURY

b3

SUBPOENA FOR:

☐ PERSON ☒ DOCUMENTS OR OBJECT(S)

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE:

United States Courthouse  
225 South Pierre Street  
Pierre, SD

DATE AND TIME:

b3

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

b3  
b6  
b7C

☐ Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the Court or by an officer acting on behalf of the Court.

CLERK:

JOSEPH HAAS

DATE:

(BY) DEPUTY CLERK:

b3  
b6  
b7C

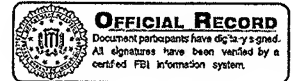
This subpoena is issued upon application of the United States of America.

NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY

Public Integrity Section, US DOJ  
1400 New York Avenue, NW  
Washington, DC 20005



UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**  
**Electronic Communication**

Title: (U) EC documenting LHM to FBIHQ

Date: 07/29/2013

To: D6-PCU

From: MINNEAPOLIS

MP-SD-2

Contact: [REDACTED]

Approved By: SSRA [REDACTED]

b6  
b7C

Drafted By: [REDACTED]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER**LAW ENFORCEMENT SENSITIVE**

This information is the property of the FBI and may be distributed to state, tribal, or local government law enforcement officials with a need-to-know. Further distribution without FBI authorization is prohibited. Precautions should be taken to ensure this information is stored and/or destroyed in a manner that precludes unauthorized access.

Synopsis: (U) To advise FBIHQ of SIM and enclose LHM

[REDACTED]

b7E

Enclosure(s): Enclosed are the following items:

1. (U) LHM

Details:

[REDACTED]  
[REDACTED]  
[REDACTED] this matter was designated as a SIM. This EC is to disclose  
the formal LHM for this [REDACTED]  
[REDACTED]

b6  
b7C  
b7E

UNCLASSIFIED

Serial 45

**UNCLASSIFIED**

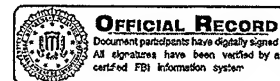
Title: (U) EC documenting LHM to FBIHQ  
Re: 194A-MP-74612, 07/29/2013

The disclosure and sending of this LHM was a deviation and outside Bureau guidelines, and corrective actions will be undertaken to be in compliance for future SIMs.

◆◆

**UNCLASSIFIED**

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 07/30/2013

Title: (U) Newspaper Articles related to NBPI

Approved By: SSRA

Drafted By:

b6  
b7C

Case ID #: 194A-MP-74612 (U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) Newspaper Articles related to NBPI from 07/20 -  
07/27/2013 related to their chapter 11 bankruptcy

◆◆

UNCLASSIFIED

Serial 46

194A- MP- 74612

Aberdeen American N

7/20/13

ABERDEEN

## Funding woes delay employee paychecks at beef plant

Northern Beef Packers will delay paying its employees their wages this week because of financial difficulties.

Employees were told Wednesday that their Friday paychecks would not be distributed, but it was hoped wages could be paid early next week.

Northern Beef issued the following statement by email:

"Due to ongoing delays with securing additional funding, Northern Beef Packers has notified its employees that payroll will be delayed this week. The company is making every effort to rectify the situation as quickly as possible."

Northern Beef Packers laid off 108 workers on April 25 because of a lack of working capital to buy and process cattle, plant officials said at the time.

David Palmer, CEO, said that the plant, south of Aberdeen, needed to raise about \$20 million. Northern Beef hoped to call back laid-off workers by mid- or late July, he said.

The beef plant will not release the number of employees currently working at the plant or how many cattle the plant has slaughtered since the layoff occurred.

"For competitive reasons, the company does not release employment numbers or actual production and sales data to the public," said A.J. Munger, Northern Beef Packers director of new business development.

— Reporter Jeff Natalie-Lee

# Branded-beef program fails to meet expectations

Aberdeen's Northern Beef Packers cited as part of problem

BY CHET BROKAW  
Associated Press

PIERRE — Launched with great hopes and fanfare eight years ago, the South Dakota Certified Beef program has so far fallen short of its goal of helping farmers and ranchers sell state-branded beef as a premium product commanding higher prices.

When then-Gov. Mike Rounds persuaded the 2005 Legislature to create the program, he envisioned a time when people across the nation and around the world would choose to pay more for steaks that carry a South Dakota seal of approval. He said codes on package labels could let buyers visit an Internet site to track the meat's origin, following it from a calf's birth to a feedlot and then a processor.

But that hasn't happened, largely because South Dakota hasn't had a meatpacking plant operating at a large scale that

would make processing economical, officials say. They hope the long-delayed Northern Beef Packers plant in Aberdeen will soon fill that void.

In the first eight years of the program, only 16,386 cattle — a tiny slice of a state herd that approaches 4 million head — have been enrolled by farmers and ranchers. Only 500 have made it all the way through the program to be sold as meat from the program, mostly just within South Dakota from cattle processed by small custom meat lockers.

Rounds, now running for the U.S. Senate, still thinks the program will succeed once the Aberdeen packing plant is running at full speed and more buyers demand verification of when and where cattle are born.

"I think its time will come," Rounds said earlier this month.

Todd Mortenson, a Hayes rancher who is still

registered with the program, recalled sky-high expectations when the program was launched.

"I keep hoping that something will come of it, that they'll get it revived," Mortenson said.

Mortenson and others, including state Agriculture Secretary Lucas Lentsch, said that will require developing a large-scale packing plant in South Dakota that can process cattle economically. Mortenson said selling a few cattle at a time through the program isn't worth the effort because he needs to sell a truckload of 50 cattle at a time to make the Certified Beef program work financially.

Northern Beef Packers, first proposed six years ago, is now operating in Aberdeen but well short of capacity. The plant laid off 108 of its approximately 420 workers in April, citing lack of money to buy and process high volumes of cattle. The plant at the time was slaughtering

about 200 cattle a day; its goal is up to 1,500 daily.

A.J. Mungér, director of new business development at the plant, said Northern Beef Packers wants to work with the South Dakota Certified Beef program. He said plant managers hope to reach capacity soon. He declined to talk about efforts to get additional financing to buy more cattle.

Sarah Caslin, with the state Agriculture Department's livestock marketing and development program, said about 60 farmers and ranchers are registered with the program, with about 6,000 head of cattle currently enrolled. The program requires that cattle be born, fed and processed in South Dakota, and most cattle now are shipped to packers in Omaha or Sioux City, Iowa, she said.

The Agriculture Department spends about \$52,000 a year to run the program, with much of the cost attributed to a federal

audit of the program and the state's checking of farmers and ranchers to make sure they follow the rules, Caslin said. Part of that cost is recovered from the \$100 annual fee paid by producers and the 50-cents-a-head fee to enroll each calf, she said.

To qualify as South Dakota Certified Beef, the cattle have to be born in the state, carry electronic ear tags and be tracked every time they are sold. Before being slaughtered, cattle have to be fed a high-starch diet or corn or other grain for at least 100 days.

Caslin said other certification programs have taken a long time to develop.

"We're still in our baby steps. The producers still feel this is a good program, and we're just going to grow," she said.

And even though little meat has actually been marketed in the program, its tracking components help some farmers and ranchers sell to buyers who demand to know when and where cattle were born, Caslin said.

194A-MP-74612

Aberdeen American News  
7/22/13

7/23/12

## 2006

June: Northern Beef Packers plan to build near intersection of 135th Street and 387th Avenue on Aberdeen's south side. Businessmen Dennis Hellwig and Norg Sanderson are involved with the project.

August: Plans call for construction to start in fall with possibility of opening in spring.

November: Plant ready to begin dirtwork, but opponents circulate petitions to refer the county's TIF vote to a public vote. Petitions containing more than 1,800 signatures turned in.

## 2007

April 24: Brown County voters approve plant's TIF, 66.54 percent to 33.46 percent. Hellwig says construction will begin with bulk of financing to be squared away soon.

May: Heavy rains result in severe flooding in Aberdeen. Plant starts to pump water and add fill, causing delays.

## 2008

March: Hellwig denies rumor that plant is sold to Korean investors. Sanderson no longer involved with plant. Opening could still be in August.

July: Construction delays continue with Nov. 1 opening date. About a dozen employees on board, including David Palmer, president and chief executive officer.

October: Weather and finances lead to more construction delays. Plans call for February opening. Management team in place.

December: Hellwig says there are 66 Korean investors through the EB-5 program. TIF bonds remain unsold. Hellwig says they are one of the last pieces of financing needed.

## 2009

April: Number of liens is 12, totaling about \$8 million. Plans call for October or November opening.

August: Northern Beef Packers has yet to pay first half of property taxes due April 30. It owes \$62,003 plus a penalty of \$2,067.

September: Records filed with the Secretary of State's Office show Dennis Hellwig is no longer an owner of plant. Oshik Song is listed as the general partner. Hellwig, the former owner of Hub City Livestock Auction, had been the largest investor and plant's prime spokesman.

## 2010

February: Brown County Commissioners say Northern Beef Packers will not get benefit of TIF bonds unless it first pays past-due property taxes and penalties totaling more than \$131,000.

## 2011

May: Northern Beef Packers hires 57 employees; plant expected to open between Oct. 15-Nov. 15, Steve Kaiser, acting public relations director, said.

June: Officials: Construction on schedule to open sometime in mid-to-late fall.

July: The plant will cause Brown County's gross domestic product to quadruple and Aberdeen's population to double in 15 to 20 years, a consultant said in Aberdeen. The plant will generate \$10.1 billion economic boom to the region in the next five years and have an annual \$2.5 billion effect by its fifth year. Rod Bowling of AgriFood Solutions International said at a conference.

December: Brown County Commission announced it would release to the plant about \$917,000 in increased property taxes resulting from construction as part of an agreement that also requires the beef plant to pay for roadwork. Northern Beef Packers will be obligated to pay the cost of improving about 1.3 miles of County Road 14W in front of the plant, less \$450,000 in state grants.

## 2012

February: Officials: Plant is 90 to 95 percent completed and should be done in the first half of the year. Promotional materials for the plant state the plant will open sometime in spring 2012.

May: The Brown County Commission gave Northern Beef Packers more time to sell TIF bonds by issuing bonds for \$2.97 million directly to the company, which it can then resell. While the plant had sold \$3.98 million in TIF bonds as of the April 27 deadline, the company was short of the \$8.51 million it could have sold. The commission capped the total amount of TIF bonds the company could sell at \$6.95 million.

June: Northern Beef officials say construction is not complete at the plant because of lack of financing. The plant still had \$2 million left in TIF bonds to sell. Nine more liens are filed against the plant by contractors. Palmer said the company has not paid the contractors and that the best chance of them getting paid is for the plant to open. About 200 construction workers are on site working toward opening the plant by July 15, he said.

July 15: Beef plant opening delayed.

Sept. 28: Northern Beef Packers slaughters five cattle as part of a test. It was the first slaughtering at the plant. The plant was later approved to slaughter up to 500.

## 2013

February: Despite repeated warnings by city officials, Northern Beef Packers failed to install necessary wastewater monitoring equipment, resulting in a fine and administrative compliance order.

April 25: One hundred and eight workers were laid off to cut expenses. The plant is pursuing other financing, officials said at a news conference.

June: Northern Beef Packers fined \$7,315 after wastewater escaped from a breached wall at one of its treatment lagoons and flowed into Moccasin Creek.

July 19: Northern Beef Packers files for Chapter 11 bankruptcy.





Palmer



Song



Lander



Levsen

# BEEF PLANT BANKRUPT

## Debts mount as production slows at Northern Beef Packers

BY JEFF NATALIE-LEES  
jnatalie-lees@aberndeennews.com

Northern Beef Packers has struggled with construction delays, lack of financing, environmental fines and now faces its latest setback: Chapter 11 bankruptcy.

The plant, which began to slaughter cattle in October, has never been able to increase its production to anywhere near its projected capacity of 1,500 cattle a day.

While beef plant officials will not comment on the number of cattle slaughtered, several workers in the plant have said that there has not been any cattle slaughtered for about three weeks.

"It's been quite awhile since they have slaughtered cattle," said Herman Schumacher, a producer who has furnished the plant with cattle.

**What happened?** Northern Beef Packers filed for Chapter 11 bankruptcy, protecting it from its creditors until it can reorganize.

**What's next?** An Aug. 8 deadline has been set for the plant to file documents with the U.S. Bankruptcy Court for the District of South Dakota. A plan for reorganization must address the resolution of unpaid bills.

Without adequate cash coming in, Northern Beef has been racking up debt. The company owes money to 277 creditors locally, nationally and in South Korea. Northern Beef filed for bankruptcy protection Friday afternoon.

**See Bankrupt, 3A**

### Inside

3A: Find a complete timeline detailing the history of the Northern Beef Packers.

■ Cattle ranchers, officials and suppliers offer their thoughts.  
8A: See who the plant's top 20 creditors are.

At Aberdeen News.com:  
■ Find more stories, timelines and photo galleries of the American News' continuing coverage of the Northern Beef Packers plant in a special section.

■ To learn about breaking news when it happens, sign up for American News text alerts sent to your phone.

## Documents: Plant owes millions

BY SCOTT WALTMAN  
swaltman@aberndeennews.com

Northern Beef Packers owes money to 277 unsecured creditors, including more than \$1 million to a prime investor, according to documents filed in federal bankruptcy court.

Two new mechanics liens, both modest, have also been filed against the beef processing plant south of Aberdeen.

According to bankruptcy court documents, Northern Beef Packers has estimated assets of more than \$50 million, but less than \$100 million, and estimated liabilities of between \$10 million and \$50 million.

The largest unsecured creditor is Oshik Song, general partner, to whom \$1.04 million is owed, according to bankruptcy paperwork.

The plant also owes \$1.03 million to Hanul Law of Santa

Ana, Calif.; \$903,028 to the U.S. Treasury for payroll taxes and \$182,263 to the City of Aberdeen for utility bills, according to the court documents.

Unsecured creditors don't have any security or collateral — anything to foreclose on or repossess. So they have to, in essence, line up and hope they will eventually be paid.

According to a voluntary petition of bankruptcy filed by the plant, it "estimated" that after any exempt property is excluded and administrative expenses are paid, there will be no funds available for distribution to unsecured creditors.

The nature of the debts is "primarily business related," according to the petition.

Under federal law, when a person or business files for

**See Creditors, 8A**

Aberdeen American  
News  
7/23/13

144-10-74612

Tuesday, July 23, 2013

## CREDITORS

### From 1A

bankruptcy:

■ Creditors cannot try to collect debts until a bankruptcy judge grants them permission.

■ Pending legal action is halted until the bankruptcy court allows it to proceed.

Northern Beef Packers is involved in an unresolved civil lawsuit with a Huron contractor, Scott Olson Digging, which filed a \$2.1 million mechanics lien against Northern Beef Packers. The plant has sued the contractor, claiming it overpaid and was overcharged for dirtwork at the plant site. Scott Olson Digging then countersued the beef plant.

Previously, the plant had resolved dozens of other mechanics liens that had been filed against it.

The two new mechanics liens against the beef plant are from recent months. One, for \$4,300, was filed earlier this month by Climate Makers of Hastings, Minn. It is for labor and materials related to repairing a boiler,

### Beef plant's 20 largest unsecured claims

There are more than 250 creditors for Northern Beef Packers listed in legal documents. These are the top 20 largest unsecured claims:

- 1. Oshuk Song, Eden Prairie, Minn.; note payable: \$1.04 million.
- 2. Hanul Law, Santa Ana, Calif.; note payable: \$1.025 million.
- 3. U.S. Treasury, Cincinnati; payroll taxes: \$903,028.
- 4. Cryovac Inc., Chicago; equipment lease: \$800,373.
- 5. DXP Enterprises, Dallas; vendor: \$538,496.
- 6. Woo Song International, Seoul, South Korea; note payable: \$515,000.
- 7. Dakota Farm Raised High Quality Beef LP, Aberdeen; money loaned: \$500,000.
- 8. Polarway Investment Limited c/o Hanul Law, Santa Ana, Calif.; promissory notes: \$500,000.
- 9. Daesung Kyungkido-Hwasungsi, vendor: \$478,924.
- 10. Quality Value Excellent Sanita-

tion Team, Greeley, Colo.; vendor: \$342,572.

■ 11. Farnam Street Financial, Minnetonka, Minn.; lease/services provided: \$266,764.

■ 12. Moss & Barnett, Minneapolis; legal services: \$198,202.

■ 13. C.H. Robinson Worldwide Inc., Minneapolis; vendor: \$185,896.

■ 14. City treasurer, Aberdeen; vendor: \$182,263.

■ 15. IEH Laboratories & Consulting Group, Seattle; vendor: \$145,065.

■ 16. Lift Solutions, Omaha, Neb.; vendor: \$101,315.

■ 17. NorthWestern Energy, Butte, Mont.; services provided/gas and electric: \$101,315.

■ 18. Avera Health Plans, Sioux Falls; Vendor: \$94,812.

■ 19. Rock Tenn, Orlando, Fla.; vendor: \$88,230.

■ 20. Avera St. Luke's Hospital, Aberdeen; vendor: \$81,695.

Source: Federal bankruptcy court documents

er, according to lien paperwork filed at the Brown County Register of Deeds Office. The other, for \$2,819, was filed in May by Diamond Vogel Paints of Aberdeen. It's for labor,

services, material or machinery furnished, according to the lien.

The plant is also delinquent in paying its property taxes. According to the Brown County Treas-

urer's Office, it owes roughly \$500,000 on eight parcels of property. That money was due at the end of April.

Follow @ScottReports on Twitter.



7/23/13

## BANKRUPT

From 1A

Chapter 11 gives a company protection from its creditors while it reorganizes, said Rory King, the attorney representing Northern Beef. A business can continue to operate, unlike under Chapter 7 bankruptcy, which involves liquidation of a company.

An Aug. 8 deadline has been set for the plant to file a statistical summary, a statement of financial affairs and other documents with the U.S. Bankruptcy Court for the District of South Dakota, according to court paperwork.

Ultimately, a plan for reorganization must address the resolution of unpaid bills. The creditors, Northern Beef and the court will all have some say in the restructuring of debt.

The plant's most recent financial difficulties came

to light April 25 when the company laid off 108 workers. Northern Beef CEO David Palmer said that the plant, south of Aberdeen, needed to raise about \$20 million in working capital to buy and process cattle.

Northern Beef was not successful in raising all the additional funding it needed. Last week, employees were told that their paychecks would be delayed because of financial difficulties.

"For the last several months, we have been working to secure a strategic equity investment to move our business into the next phase of production," Palmer said through a news release Monday.

"Due to the size and importance of this investment, the process is taking longer than what was originally expected. At the same time, the beef packing industry has been experiencing some of its worst processing margins in recent decades, causing expected start-up costs to

be much higher than anticipated. This has significantly reduced our cash position and is preventing us from meeting our current obligations."

The beef plant is working with secured lenders and interested parties to formulate a restructuring plan, Palmer said. Once approved by the court, the financing, along with cash generated from any ongoing business operations, will be used to pay operating expenses, he said.

Northern Beef officials declined to answer questions about the timeline for employee payment and production numbers when contacted by the American News. Contacted by phone Monday, Oshik Song, general partner of Northern Beef, said he preferred to let the written news release explain the situation because of his English speaking abilities. Song, a South Korean businessman who lives in Eden Prairie, Minn., is the beef plant's biggest investor.

The debts racked up by

the company affect many companies as well as the city of Aberdeen.

Northern Beef owes municipal utility bills of \$182,263, according to a list of the 20 largest unsecured creditors included in the U.S. Bankruptcy Court documents. The bills are for unpaid water and wastewater treatment, said Lynn Lander, city manager. The city will require Northern Beef to provide a surety in order for the city to continue to provide service, he said. That surety must be set up within approximately 20 days, he said.

"We need to wait and see how this works itself out," Mayor Mike Levsen said. "The word 'bankruptcy' scares people, but for businesses having difficulties, it is one option for them. Sometimes it is a step toward a good resolution. It could work out for the better or worse. We will have to see what happens."

Follow @Business\_AAN on Twitter.

"It was inevitable . . . We haven't been killing cows."

# 260 lose beef plant jobs

## Layoffs the latest blow to \$115 million processing plant

BY JEFF NATALIE-LEES  
[jnatalie-lees@aberdeennews.com](mailto:jnatalie-lees@aberdeennews.com)

Northern Beef Packers laid off 260 workers Wednesday, leaving only six employees to watch over the vacant plant while it goes through Chapter 11 bankruptcy.

"We were all called into a

meeting at 10:30 a.m. and told that we were being laid off," said Jeffery LaCroix, who worked on the slaughter line. "They handed us a sheet that told us about filing for unemployment. They told us no other information. They said

See Layoffs, 7A

Readers react to new beef plant news.

Employee assistance meeting Friday.

**7A**

## Workers shocked, worried after layoffs

BY JEFF NATALIE-LEES  
[jnatalie-lees@aberdeennews.com](mailto:jnatalie-lees@aberdeennews.com)

Northern Beef Packers employees began streaming into the Department of Labor office to file for unemployment benefits and look for jobs shortly after they were laid off Wednesday morning.

Leydis Estrada and her mother, Rafaela Novarro, were two of 260

employees laid off. They filled out forms at the office at 11:30 a.m. Estrada had worked in the fabrication department on the rip line, she said. She helped cut meat into smaller portions before it was boxed. She was surprised about the layoff.

"They kept telling us that we would start to kill cattle on Monday," she said.

See Workers, 7A

Aberdeen American News  
7/25/13

194A-WP-74612

7/26/13

## Despite reports, Palmer still heads beef plant

BY JEFF NATALIE-LEES

*jnatie-lees@abernnews.com*

At the end of a day of confusing information Thursday, David Palmer was still the president and CEO of Northern Beef Packers, despite television reports to the contrary.



KSFY-TV of Sioux Falls reported on its website Thursday morning that Palmer had told the station that he had resigned his post at the Aberdeen beef plant.

Palmer, when contacted by the American News, Palmer and beef plant general partner and 40 percent owner Oshik Song denied that report.

Song said that Palmer was still with the company and had no change in job titles.

KSFY updated its story in the afternoon, saying that Palmer was still with the company. KSFY reported that Palmer did not say why he made the original comment about leaving the company. When contacted later in the day by The Associated Press, Palmer said he had no comment.

The confusion over Palmer's status comes after a week of bad news from Northern Beef Packers.

Northern Beef declared Chapter 11 bankruptcy on July 19 and laid off 260 workers on Wednesday. Only six employees are now watching over the vacant plant. Northern Beef, which has

**See Beef, 6A**

## BEEF

From 1A

struggled since its inception, owes million of dollars to 277 creditors.

When contacted to clarify Palmer's status, A.J. Munger, who previously served as a spokesman and director of new business development, said he is no longer an

employee of Northern Beef.

The South Dakota Department of Labor and Regulation has scheduled a meeting at 10:30 a.m. today at the Ramkota in Aberdeen with the laid-off workers to inform them about unemployment benefits and services available to help them find new jobs.

Follow @Business\_AAN on Twitter

# Laid-off beef workers angry about paychecks

Chapter 11  
filing halts  
delayed  
wages;  
former  
employees  
rally at  
courthouse,  
beef plant

BY ELISA SAND  
[esand@aberdeennews.com](mailto:esand@aberdeennews.com)

Several dozen laid-off Northern Beef Packers workers Friday demanded answers about their delinquent paychecks, but state officials said bankruptcy proceedings have halted a process that would have gotten them at least partial compensation.

Workers took their frustration around the city Friday, first at a morning labor department Rapid Response meeting, then to the Brown County Courthouse and finally back to the

beef plant in the late afternoon, where Brown County sheriff's deputies dispersed the crowd.

The news about the paycheck delays was not well received at the South Dakota Department of Labor meeting at the Ramkota Inn, where about 60 former plant employees yelled questions in both Spanish and English while state officials attempted to relay information about services that were available.

Interpreters were available to translate in Spanish and Karen, but as the meeting progressed, officials had less

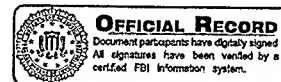
**See Beef Plant, 6A**



Luis Peña, a laid-off beef plant worker, second from left, talks to City Attorney Adam Altman about beef plant workers wanting answers about the paychecks they have not received. American News Photo by Jeff Natalie-Lees

194A-MP-74612  
7/27/13  
Aberdeen American News

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 07/30/2013

Title: (U) FGJ Subpoena for [REDACTED]

b3

Approved By: SSRA [REDACTED]

Drafted By: [REDACTED]

b6  
b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

### FEDERAL GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(E)

Do not disseminate except as authorized by federal rule of criminal procedure 6(e).

Synopsis: (U) FGJ Subpoena for [REDACTED]

b3

◆◆

UNCLASSIFIED

Serial 47

# United States District Court

DISTRICT OF SOUTH DAKOTA

TO:

b3

## SUBPOENA TO TESTIFY BEFORE GRAND JURY

SUBPOENA FOR:

☐ PERSON ☒ DOCUMENTS OR OBJECT(S)

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE:  
United States Courthouse  
400 South Phillips Avenue  
Sioux Falls, SD

DATE AND TIME:

b3

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

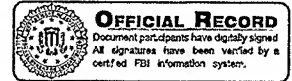
See Attachment .

☐ Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the Court or by an officer acting on behalf of the Court.

CLERK:  JOSEPH HAAS	DATE: <div></div>
(BY) DEPUTY CLERK: <div></div>	
This subpoena is issued upon application of the United States of America.	NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY <div></div> Public Integrity Section, US DOJ 1400 New York Avenue, NW Washington, DC 20005 <div></div>

b3  
b6  
b7C



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 07/30/2013

[redacted] white male, date of birth (DOB) [redacted] Social Security  
Number (SSN) [redacted]  
[redacted] cell phone number [redacted]

[redacted] was interviewed at his current employer, [redacted]  
[redacted] Also  
participating in the interview was [redacted]

b6  
b7C

[redacted] was advised that the  
interview was completely voluntary. After being advised of the identity of  
the interviewing agents and the nature of the interview, [redacted] provided  
information which was fully recorded on a digital recorder of [redacted]  
[redacted] was advised that the interview would be recorded and agreed  
to it's recording. Refer to this recording and it's transcript for any  
details related to this interview.

Investigation on [redacted] at [redacted] United States (In Person)

File # 194A-MP-74612Date drafted 07/30/2013

by [redacted]

b6  
b7C

Serial 48



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 07/30/2013

[redacted] white male, date of birth (DOB) [redacted] Social  
Security Number (SSN) [redacted]

[redacted] was interviewed at his residence. Also participating in the  
interview was [redacted]

b6  
b7C

[redacted] was advised that the interview was  
completely voluntary. After being advised of the identity of the  
interviewing agents and the nature of the interview, [redacted] provided  
information which was fully recorded on a digital recorder of [redacted]  
[redacted] was advised that the interview would be recorded and  
agreed to it's recording. Refer to this recording and it's transcript for  
any details related to this interview.

Investigation on [redacted] at [redacted] United States (In Person)

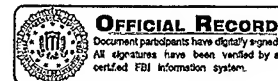
File # 194A-MP-74612Date drafted 07/30/2013

by [redacted]

b6  
b7C

Serial 49





## FEDERAL BUREAU OF INVESTIGATION

Date of entry 07/30/2013

[redacted] white male, date of birth (DOB) [redacted] Social  
Security Number (SSN) [redacted]

[redacted] was interviewed at his residence. Also participating in the  
interview was [redacted]

[redacted] was advised that the interview was  
completely voluntary. At the beginning of the interview, [redacted]

[redacted] The interviewing agents  
explained that they are prohibited from giving [redacted] any legal advice.  
[redacted] responded to [redacted] that if there were any questions he did not  
want to answer, he simply would refuse to answer those. After being  
advised of the identity of the interviewing agents and the nature of the  
interview, [redacted] provided information which was fully recorded on a  
digital recorder of [redacted] was advised that the  
interview would be recorded and agreed to it's recording. Refer to this  
recording and it's transcript for any details related to this interview.

b6  
b7C

Investigation on [redacted] at [redacted] United States (In Person)

File # 194A-MP-74612

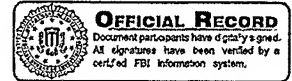
Date drafted 07/30/2013

by [redacted]

b6  
b7C

Serial 50

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 07/31/2013

Title: (U) 2nd FGJ Subpoena for [REDACTED]

b3

Approved By: SSRA [REDACTED]

b6

Drafted By: [REDACTED]

b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -

SENSITIVE INVESTIGATIVE MATTER

### FEDERAL GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(E)

Do not disseminate except as authorized by federal rule of criminal procedure 6(e).

Synopsis: . (U) 2nd FGJ Subpoena for [REDACTED]

b3

◆◆

UNCLASSIFIED

Serial 51

**United States District Court**  
DISTRICT OF SOUTH DAKOTA

TO:

**SUBPOENA TO TESTIFY  
BEFORE GRAND JURY**

b3

SUBPOENA FOR:

☐ PERSON    ☒ DOCUMENTS OR OBJECT(S)

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE:  
United States Courthouse  
400 South Phillips Avenue  
Sioux Falls, SD

DATE AND TIME:

b3

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

See Attachment .

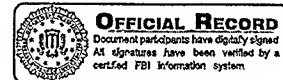
☐ Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the Court or by an officer acting on behalf of the Court.

<p>CLERK:</p> <p style="text-align: center; font-weight: bold;">JOSEPH HAAS</p>	<p>DATE:</p> <div style="border: 1px solid black; height: 20px; width: 80%; margin: 0 auto;"></div>
<p>(BY) DEPUTY CLERK</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>
<p>This subpoena is issued upon application of the United States of America.</p>	<p>NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY</p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <p>Public Integrity Section, US DOJ 1400 New York Avenue, NW Washington, DC 20005</p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>

b3  
b6  
b7C

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 07/31/2013

Title: (U) FGJ Subpoena for

b3  
b6  
b7C

Approved By: SSRA

Drafted By:

b6  
b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) FGJ Subpoena for

b3  
b6  
b7C

◆◆

UNCLASSIFIED

*Serial 52*

# United States District Court

DISTRICT OF SOUTH DAKOTA

TO:

## SUBPOENA TO TESTIFY BEFORE GRAND JURY

b3  
b6  
b7C

SUBPOENA FOR:

☒ PERSON    ☐ DOCUMENTS OR OBJECT(S)

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE:

United States Courthouse  
400 South Phillips Avenue  
Sioux Falls, SD

DATE AND TIME:

b3

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

b3  
b6  
b7C

☐ Please see additional information on reverse.

This subpoena shall remain in effect until you are granted leave to depart by the Court or by an officer acting on behalf of the Court.

CLERK:

JOSEPH HAAS

DATE:

(BY) DEPUTY CLERK:

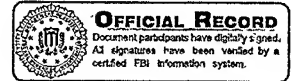
b3  
b6  
b7C

This subpoena is issued upon application of the United States of America.

NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY

Public Integrity Section, US DOJ  
1400 New York Avenue, NW  
Washington, DC 20005

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Evidence Log**Event Title: (U) Recorded interview of [redacted]  
[redacted]

Date: 08/08/2013

Approved By: SSRA [redacted]

b6  
b7C

Drafted By: [redacted]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

[redacted]

b7E

Acquired By: [redacted] on 08/08/2013

Acquired From: (U) [redacted]

Receipt Given?: No

b6  
b7C

Holding Office: MINNEAPOLIS

## Details:

Recorded interview of [redacted]

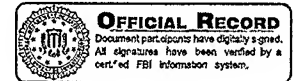
Item Type	Description
1D	(U) CD of recorded interview Acquired On: 08/08/2013 ELSUR Evidence Type: Other Intercept Type: Recording of Interview Media Type: Computer Disk Original Type: Original

◆◆

UNCLASSIFIED

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Serial 53



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/08/2013

[redacted] date of birth [redacted] Social Security  
Account Number [redacted] residence address [redacted]  
[redacted] cellular telephone number [redacted] was interviewed  
at [redacted] Also present  
during the interview was FBI Special Agent [redacted] was  
advised of the identities of the interviewing agents and the nature of the  
interview. The interview was recorded in its entirety and the recording of  
the interview or its transcript should be referred to for an account of the  
interview.

b6  
b7C

Investigation on [redacted] at [redacted] United States (In Person)

File # 194A-MP-74612

Date drafted 08/08/2013

by [redacted]

b6  
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

*Serial 54*

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Evidence Log**

Event Title: (U) Recorded interview of [REDACTED] Date: 08/08/2013

Approved By: SSRA [REDACTED]

b6  
b7C

Drafted By: [REDACTED]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

b7E

Acquired By: [REDACTED] on 08/08/2013

Acquired From: (U) [REDACTED]

Receipt Given?: No

b6  
b7C

Holding Office: MINNEAPOLIS

## Details:

Recorded interview of [REDACTED]

## Item Type

## Description

1D

(U) CD of recorded interview

Acquired On: 08/08/2013

ELSUR Evidence Type: Other

Intercept Type: Recording of Interview

Media Type: Computer Disk

Original Type: Original

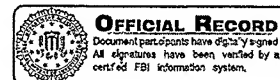
◆◆

UNCLASSIFIED

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Serial 55





## FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/08/2013

[redacted] date of birth [redacted] Social Security  
Account Number [redacted] residence address [redacted]  
[redacted] cellular telephone number [redacted] was interviewed at the  
FBI office in Pierre, SD. Also present during the interview was FBI  
Special Agent [redacted] The interview was recorded in its entirety  
and the recording of the interview and its transcript should be referred to  
for a an account of the interview.

b6  
b7C

Investigation on [redacted] at [redacted] United States (In Person)

File # 194A-MP-74612

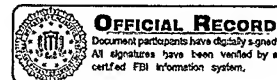
Date drafted 08/08/2013

by [redacted]

b6  
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Serial 56



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/07/2013

[redacted] work  
address [redacted] work e-mail  
address [redacted] work telephone number [redacted] was  
interviewed at his office in [redacted] Also present during the interview  
were FBI Special Agent (SA) [redacted] and [redacted]  
[redacted] was advised of the identities of the  
interviewing agents and the nature of the interview and thereafter provided  
the following information:

b6  
b7C

[redacted]

b6  
b7C

[redacted]

b6  
b7C

[redacted]

b6  
b7C

[redacted] was thanked for the information he provided and the interview  
was concluded.

b6  
b7C

Investigation on [redacted] at [redacted] United States (In Person)

File # 194A-MP-74612

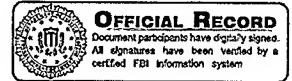
Date drafted 08/07/2013

by [redacted]

b6  
b7C

Serial 57

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 08/09/2013

Title: (U)  FGJ Subpoena

b3

Approved By: A/SSRA

Drafted By:

b6  
b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -

SENSITIVE INVESTIGATIVE MATTER

### FEDERAL GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(E)

Do not disseminate except as authorized by federal rule of criminal procedure 6(e).

Synopsis: (U)  FGJ Subpoena

b3

◆◆

UNCLASSIFIED

*Serial 58*

**United States District Court**  
DISTRICT OF SOUTH DAKOTA

TO:

**SUBPOENA TO TESTIFY  
BEFORE GRAND JURY**

SUBPOENA FOR:

☐ PERSON ☒ DOCUMENTS OR OBJECT(S)

b3

2012R00460-20  
YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

PLACE:  
United States Courthouse  
400 South Phillips Avenue  
Sioux Falls, SD

DATE AND TIME:

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

See attachment to this subpoena.

☐ Please see additional information on reverse.

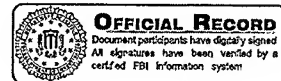
This subpoena shall remain in effect until you are granted leave to depart by the Court or by an officer acting on behalf of the Court.

CLERK:  JOSEPH HAAS		DATE: <div></div>
(BY) DEPT	<div></div>	<div></div>
This subpoena is issued upon application of the United States of America.		NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY <div></div> Public Integrity Section, US DOJ 1400 New York Avenue, NW Washington, DC 20005 <div></div>

b3  
b6  
b7C

RETURN OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (NAME)		
SERVED BY		TITLE
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <p>Executed on _____ Signature of Server</p>		
ADDITIONAL INFORMATION		

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**

**Import Form**

Form Type: OTHER

Date: 08/09/2013

Title: (U) Email from

b6  
b7C  
b7D

Approved By: A/SSRA

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) Email from

b6  
b7C  
b7D

◆◆

UNCLASSIFIED

*Serial 59*

Info from [redacted]

Page 1 of 1

**Info from** [redacted]

[redacted]

**Sent:** Thursday, August 01, 2013 6:35 PM

**To:** [redacted] (MP FBI); [redacted]

**Attachments:** [redacted]

b6  
b7C  
b7D

[redacted]

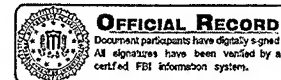
[redacted]

[redacted]

[redacted]

b7E

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Dissemination of Information to Other Agencies

Title: (U) LHM Opening Dissemination to DOJ

Date: 08/09/2013

Approved By:

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

b7E

Responsible Organization: CRIMINAL INVESTIGATIVE

Agency Contacted: Department of Justice on 08/09/2013 via Note

POC:

b6  
b7C

Disseminated On: 08/09/2013 (Once)

Dissemination Details: (U) Disseminated this serial in weekly package for DOJ Public Integrity Section.

Method: Written

Follow-up Required (SSTF): No

Disseminated Serials:

194A-MP-74612

Serial 45

(U) EC documenting LHM  
to FBIHQ

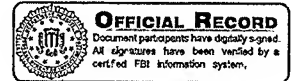
♦♦

UNCLASSIFIED

Serial 60



UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Evidence Log**Event Title: (U) Recorded interview of [redacted]  
[redacted]

Date: 08/28/2013

b6  
b7C

Approved By: SSRA [redacted]

Drafted By: [redacted]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

[redacted]

b7E

Acquired By: [redacted] on 08/28/2013

Acquired From: (U) [redacted]

Receipt Given?: No

Holding Office: MINNEAPOLIS

b6  
b7C**Details:**

Recorded interview of [redacted]

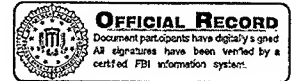
Item Type	Description
1D	(U) CD of recorded interview
	Acquired On: 08/28/2013
	ELSUR Evidence Type: Other
	Intercept Type: Recording of Interview
	Media Type: Computer Disk
	Original Type: Original

◆◆

UNCLASSIFIED

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

Serial 61



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/28/2013

[redacted] date of birth [redacted] Social Security Account  
Number [redacted] residence address [redacted]  
[redacted] work telephone number [redacted] cellular telephone number

[redacted] was interviewed at the office of [redacted]  
[redacted] Also present during the  
interview was [redacted] The  
interview was recorded in its entirety and the recording of the interview  
and its transcript should be referred to for an account of the interview.

b6  
b7C

Investigation on [redacted] at [redacted] United States (In Person)

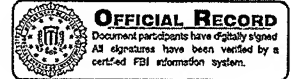
File # 194A-MP-74612Date drafted 08/28/2013

by [redacted]

b6  
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

*Serial 62*



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/29/2013

[redacted] date of birth (DOB)  
[redacted] Social Security Number (SSN) [redacted]  
[redacted]  
[redacted] was interviewed at [redacted] Also  
participating in the interview was [redacted]  
[redacted] was advised that the  
interview was completely voluntary. After being advised of the identity of  
the interviewing agents and the nature of the interview [redacted] provided  
information which was fully recorded on a digital recorder of Special Agent  
(SA) [redacted] was advised that the interview would be  
recorded and agreed to it's recording. Refer to this recording and it's  
transcript for any details related to this interview.

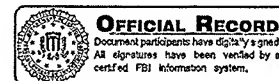
b6  
b7C

Investigation on [redacted] at [redacted] United States (In Person)  
File # 194A-MP-74612 Date drafted 08/29/2013  
by [redacted]

b6  
b7C

Serial 63

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: EMAIL

Date: 08/29/2013

Title: (U) Email from [REDACTED]

b6  
b7C  
b7E

Approved By: SSRA [REDACTED]

Drafted By: [REDACTED]

b6  
b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) Email from [REDACTED]

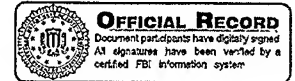
b6  
b7C  
b7E

◆◆

UNCLASSIFIED

Serial 64

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 08/29/2013

Title: (U)

b7D

Approved By: SSRA

Drafted By:

b6  
b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U)

b7D

◆◆

UNCLASSIFIED

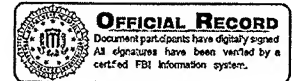
Serial 65

FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1370639-0

Total Deleted Page(s) = 29  
Page 2 ~ b6; b7C; b7D; b7E;  
Page 3 ~ b6; b7C; b7D; b7E;  
Page 4 ~ Duplicate;  
Page 8 ~ b6; b7C; b7D;  
Page 9 ~ b7D;  
Page 10 ~ b7D;  
Page 18 ~ b6; b7C; b7D; b7E;  
Page 19 ~ b6; b7C; b7D; b7E;  
Page 20 ~ b6; b7C; b7D; b7E;  
Page 21 ~ b6; b7C; b7D; b7E;  
Page 22 ~ b6; b7C; b7D; b7E;  
Page 23 ~ Duplicate;  
Page 24 ~ b6; b7C; b7D; b7E;  
Page 25 ~ b6; b7C; b7D; b7E;  
Page 26 ~ b6; b7C; b7D; b7E;  
Page 27 ~ b6; b7C; b7D; b7E;  
Page 31 ~ b6; b7C; b7E;  
Page 32 ~ b6; b7C; b7E;  
Page 33 ~ b7E;  
Page 36 ~ b6; b7C; b7E;  
Page 37 ~ b6; b7C; b7E;  
Page 39 ~ b6; b7C; b7E;  
Page 40 ~ b6; b7C; b7E;  
Page 42 ~ b7E;  
Page 43 ~ b7E;  
Page 44 ~ Referral/Consult;  
Page 45 ~ Referral/Consult;  
Page 46 ~ Referral/Consult;  
Page 47 ~ Referral/Direct;

```
XXXXXXXXXXXXXXXXXXXXXXXXXXXXX
X   Deleted Page(s)         X
X   No Duplication Fee      X
X   For this Page           X
XXXXXXXXXXXXXXXXXXXXXXXXXXXXX
```

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 02/24/2014

Title: (U)

b7D  
b7E

Approved By: A/SSRA

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

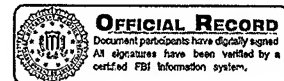
Synopsis: (U)

b7D  
b7E

◆◆

UNCLASSIFIED

Serial 96



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 04/14/2014

[redacted] telephone number [redacted] called the FBI office in Pierre, SD stating that he had information regarding [redacted] [redacted] was interviewed telephonically. [redacted] was advised of the identity of the interviewing agent and the nature of the interview and thereafter provided the following information:

b6  
b7C

[redacted]  
[redacted]  
[redacted]

b6  
b7Cb6  
b7C

[redacted] had suspicions regarding the death of Richard Benda. [redacted] has talked to people that have stated they do not think Benda's death was an accident. [redacted] was suspicious about Benda's death because the state investigated his death. [redacted] did not have any further information regarding Benda's death.

b6  
b7C

[redacted] was thanked for speaking with the interviewing agent and the interview was concluded.

b6  
b7C

Investigation on [redacted] at [redacted] United States (Phone)

File # 194A-MP-74612

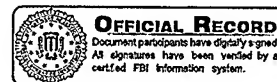
Date drafted 04/14/2014

by [redacted]

b6  
b7C



UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: EMAIL

Date: 04/28/2014

Title: (U) [REDACTED]

b6  
b7C  
b7D

Approved By: SSRA [REDACTED]

Drafted By: [REDACTED]

b6  
b7C

Case ID #: 194A-MP-74612 (U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) [REDACTED]

Enclosure(s): Enclosed are the following items:

b6  
b7C  
b7D

1. (U) [REDACTED]

◆◆

UNCLASSIFIED

Serial 98

To:

[redacted] (WF) (FBI)

Subject:

[redacted] --- UNCLASSIFIED

b6  
b7C  
b7D

SentinelCaseId: 194A-MP-74612

SentToSentinel: 4/28/2014 4:18:20 PM

Classification: UNCLASSIFIED

=====

Sent for Approval for RECORD/[redacted] Case 194A-MP-74612

b7E

[redacted]

b7D

[redacted]

b6  
b7C  
b7D

=====

Classification: UNCLASSIFIED

## FEDERAL BUREAU OF INVESTIGATION

Date of entry 05/09/2014

[redacted]  
[redacted] telephone number [redacted]  
was interviewed telephonically at his office. After being advised of the  
identity of the interviewing agent and the nature of the interview, [redacted]  
provided the following information: -

b6  
b7C

b6  
b7C

b6  
b7C

[REDACTED] concluded that Benda's death was a tragedy and that he was unsure whether it was a suicide or hunting accident, but Benda gave no signs of suicidal behavior and that [REDACTED]

b6  
b7C

Investigation on [redacted] at [redacted] United States (Phone)

File # 194A-MP-74612

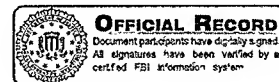
Date drafted 05/09/2014

by

b6  
b7C

Serial 99

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Electronic Communication**

Title: (U) Investigation of [redacted]  
[redacted] to be conducted  
prior to closing.

Date: 05/16/2014

b6  
b7C

From: MINNEAPOLIS

MP-SD-2

Contact: [redacted]

Approved By: [redacted]

b6  
b7C

Drafted By: [redacted]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) Examination of [redacted]  
[redacted] to be conducted prior to closing case.

b6  
b7C

[redacted]

b7E

Details:

[redacted]  
[redacted]b6  
b7C  
b7E[redacted]  
[redacted]b6  
b7C  
b7E[redacted]  
[redacted]

b7E

UNCLASSIFIED

Serial 100

UNCLASSIFIED

Title: (U) Investigation of [REDACTED]  
to be conducted prior to closing.

Re: 194A-MP-74612, 05/16/2014

b6  
b7C

[REDACTED]  
[REDACTED]

b7E

[REDACTED]  
[REDACTED]

b7E

[REDACTED]  
[REDACTED]  
[REDACTED]

b6  
b7C  
b7E

Writer and SA [REDACTED] have been in contact with WFO SA [REDACTED]  
[REDACTED] who has a CHS knowledgeable about the EB-5 program. SA [REDACTED]  
has offered assistance with the continued efforts in this  
investigation.

b6  
b7C  
b7E

SA [REDACTED] who has been the lead SA in this case, is  
transferring to Minneapolis within the next 30 days, and SA [REDACTED]  
will replace him as the lead case agent in this matter. It is  
anticipated that SA [REDACTED]  
[REDACTED] to establish an investigative strategy  
regarding [REDACTED] and will also coordinate these efforts  
with SA [REDACTED]

b6  
b7C  
b7E

UNCLASSIFIED

UNCLASSIFIED

Title: (U) Investigation of [REDACTED]  
to be conducted prior to closing.  
Re: 194A-MP-74612, 05/16/2014

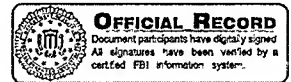
b6  
b7c

Investigation is continuing at Sioux Falls, South Dakota.

◆◆

UNCLASSIFIED

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Electronic Communication

Title: (U) [redacted] activities to be reviewed.

Date: 09/10/2014

b6  
b7C

From: MINNEAPOLIS

MP-SD-2

Contact: [redacted]

Approved By: [redacted]

b6  
b7C

Drafted By: [redacted]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) [redacted] activities to be reviewed.

b6  
b7C

[redacted]

b7E

Details:

[redacted]  
[redacted]

b6  
b7C  
b7E

[redacted]  
[redacted]

b6  
b7C  
b7E

[redacted]  
[redacted]

b7E

UNCLASSIFIED

Serial 101

UNCLASSIFIED

Title: (U) [redacted] activities to be reviewed.  
Re: 194A-MP-74612, 09/10/2014

b6  
b7C

[redacted]  
[redacted]

b7E

[redacted]  
[redacted]

b7E

[redacted]  
[redacted]  
[redacted]  
[redacted]

b6  
b7C  
b7E

Writer has also been coordinating with WFO SA [redacted] who is  
involved in a [redacted] A WFO  
intelligence analyst will coordinate with the Sioux Falls RA  
intelligence analyst.

b6  
b7C  
b7E

Investigation is continuing.

◆◆

UNCLASSIFIED



UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 10/01/2014

Title: (U)

b7D

b7E

Approved By: SSRA

b6

b7C

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -

SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U)

b7D

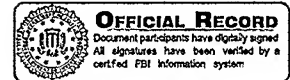
b7E

◆◆

UNCLASSIFIED

Serial 102

UNCLASSIFIED



**FEDERAL BUREAU OF INVESTIGATION**  
**Electronic Communication**

Title: (U) EC to enter 1A into case file

Date: 10/02/2014

CC: b6  
b7C

From: MINNEAPOLIS

MP-SD-2

Contact: Approved By: SSRA b6  
b7CDrafted By: 

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER**LAW ENFORCEMENT SENSITIVE**

This information is the property of the FBI and may be distributed to state, tribal, or local government law enforcement officials with a need-to-know. Further distribution without FBI authorization is prohibited. Precautions should be taken to ensure this information is stored and/or destroyed in a manner that precludes unauthorized access.

**Synopsis:** (U) EC to enter 1A into case file containing documents re: civil actions re: EB-5

b7E

**Enclosure(s):** Enclosed are the following items:

1. (U) Documents re: civil actions re: EB-5 program

**Details:**

This EC serves to enter 1A into case file containing documents regarding civil actions regarding EB-5 program.

UNCLASSIFIED

Serial 104

UNCLASSIFIED

Title: (U) EC to enter 1A into case file  
Re: 194A-MP-74612, 10/02/2014

◆◆

UNCLASSIFIED

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Electronic Communication

Title: (U)

Date: 11/26/2014

b7E

From: MINNEAPOLIS

MP-SD-2

Contact:

Approved By:

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U)

b7E

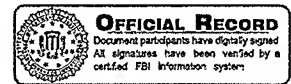
Details:

b6  
b7C  
b7E

b6  
b7C  
b7E

UNCLASSIFIED

Serial 105



## FEDERAL BUREAU OF INVESTIGATION

Date of entry 12/12/2014

[redacted]  
was interviewed by SA [redacted] and provided the following:

b6  
b7C

[redacted] has researched the [redacted] DOB  
[redacted] SSN [redacted] and determined that  
[redacted]

b6  
b7C

[redacted]  
[redacted]  
[redacted]

b6  
b7C

[redacted]  
[redacted]

b6  
b7C

[redacted] could provide no further information but will continue to  
cooperate.

b6  
b7C

Investigation on [redacted] at [redacted] United States (In Person)

File # 194A-MP-74612Date drafted 12/12/2014

by [redacted]

b6  
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

*Serial 106*

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Electronic Communication

Title: (U) [REDACTED]  
[REDACTED]

Date: 12/12/2014

b7E

CC: IO-ASIA

From: MINNEAPOLIS

MP-SD-2

Contact: [REDACTED]

Approved By: [REDACTED]

b6  
b7C

Drafted By: [REDACTED]

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U) [REDACTED]  
[REDACTED]

b7E

[REDACTED]

b7E

Administrative Notes: (U) [REDACTED]  
[REDACTED]

b6  
b7C  
b7E

Details:

[REDACTED]  
[REDACTED]

b7E

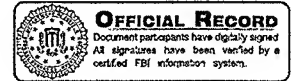
[REDACTED]

b7E

UNCLASSIFIED

Serial 107

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: LHM

Date: 01/06/2015

Title: (U)

b7E

Approved By: LEGAT

b6  
b7C

Drafted By:

Case ID #: 80-HK-C2931448

(U) HONG KONG: U.S. Consulate; Hong Kong Police Force; Hong Kong Customs & Excise; Independent Commission Against Corruption; Hong Kong Department of Justice; Other Government and Private Sector;

194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U)

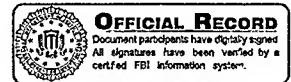
b7E

◆◆

UNCLASSIFIED

Serial 108

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Electronic Communication**

Title: (U) [REDACTED]

Date: 03/06/2015

b7E

CC: [REDACTED]  
[REDACTED]

b6

b7C

From: HONG KONG

Contact: [REDACTED]

Approved By: LEGAT [REDACTED]

b6

b7C

Drafted By: [REDACTED]

Case ID #: 80-HK-C2931448

(U) HONG KONG: U.S. Consulate; Hong Kong Police Force; Hong Kong Customs &amp; Excise; Independent Commission Against Corruption; Hong Kong Department of Justice; Other Government and Private Sector;

194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTERSynopsis: (U) [REDACTED]  
[REDACTED]

b7E

Reference: 194A-MP-74612 Serial 107

Administrative Notes: (U) ICAC reference number "(22) in AF/33/1 SF2"

Enclosure(s): Enclosed are the following items:

1. (U) [REDACTED]

b7E

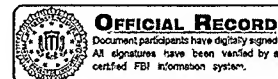
Details:  
[REDACTED]

UNCLASSIFIED

Serial 109



UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: EMAIL

Date: 05/12/2015

Title: (U) Case progress update

Approved By: SSRA

Drafted By:

b6  
b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

b5 per EOUSA

Synopsis: (U)

◆◆

UNCLASSIFIED

Serial 110

110.1

From: [REDACTED] (MP) (FBI)  
Sent: Tuesday, May 12, 2015 1:32 PM  
To: [REDACTED] (MP) (FBI)  
Subject: FW:

b6  
b7C

Please put a cc of this email into the Benda file.

Thanks,

[REDACTED]

b6  
b7C

b5 per EOUSA  
b6 per FBI/EOUSA  
b7C per FBI/EOUSA

On May 12, 2015, at 12:46 PM, [REDACTED] (MP) (FBI)  
[REDACTED] wrote:

b6  
b7C

Hey [REDACTED]

[REDACTED]  
Could you please check on that for me?

b6  
b7C

[REDACTED]

--

FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1370639-0

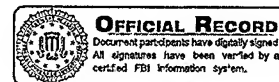
Total Deleted Page(s) = 56

Page 2 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 3 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 4 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 5 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 6 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 7 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 8 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 9 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 10 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 11 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 12 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 13 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 14 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 15 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 16 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 17 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 18 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 19 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 20 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 21 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 22 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 23 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 24 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 25 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 26 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 27 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 28 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 29 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 30 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 31 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 32 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 33 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 34 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 35 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 36 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 37 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 38 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 39 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 40 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 41 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 42 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 43 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 44 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 45 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 46 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 47 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 48 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 49 ~ b6 - per EOUSA; b7C - per EOUSA;

Page 50 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 51 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 52 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 53 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 54 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 55 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 56 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 57 ~ b6 - per EOUSA; b7C - per EOUSA;

XXXXXXXXXXXXXXXXXXXXXXXXXXXXX  
X Deleted Page(s) X  
X No Duplication Fee X  
X For this Page X  
XXXXXXXXXXXXXXXXXXXXXXXXXXXXX

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Import Form**

Form Type: Transcript

Date: 07/18/2013

Title: (U)

b6 per EOUSA

b7C per EOUSA

b6

b7C

Approved By: SSRA

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -

SENSITIVE INVESTIGATIVE MATTER

**LAW ENFORCEMENT SENSITIVE**

This information is the property of the FBI and may be distributed to state, tribal, or local government law enforcement officials with a need-to-know. Further distribution without FBI authorization is prohibited. Precautions should be taken to ensure this information is stored and/or destroyed in a manner that precludes unauthorized access.

Synopsis: (U)

b6 per EOUSA

b7C per EOUSA

◆◆

UNCLASSIFIED

Serial 42

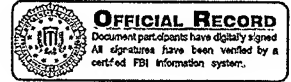
FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1370639-0

Total Deleted Page(s) = 41

Page 2 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 3 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 4 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 5 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 6 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 7 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 8 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 9 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 10 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 11 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 12 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 13 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 14 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 15 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 16 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 17 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 18 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 19 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 20 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 21 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 22 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 23 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 24 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 25 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 26 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 27 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 28 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 29 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 30 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 31 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 32 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 33 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 34 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 35 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 36 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 37 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 38 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 39 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 40 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 41 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 42 ~ b6 - per EOUSA; b7C - per EOUSA;

XXXXXXXXXXXXXXXXXXXXXXXXXXXXX  
X Deleted Page(s) X  
X No Duplication Fee X  
X For this Page X  
XXXXXXXXXXXXXXXXXXXXXXXXXXXXX

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Import Form**

Form Type: Transcript

Date: 07/18/2013

Title: (U) b6 per EOUSA  
b7C per EOUSAApproved By: SSRA b6  
b7CDrafted By: 

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER**LAW ENFORCEMENT SENSITIVE**

This information is the property of the FBI and may be distributed to state, tribal, or local government law enforcement officials with a need-to-know. Further distribution without FBI authorization is prohibited. Precautions should be taken to ensure this information is stored and/or destroyed in a manner that precludes unauthorized access.

Synopsis: (U) b6 per EOUSA  
b7C per EOUSA

◆◆

UNCLASSIFIED

Serial 41

FEDERAL BUREAU OF INVESTIGATION  
FOI/PA  
DELETED PAGE INFORMATION SHEET  
FOI/PA# 1370639-0

Total Deleted Page(s) = 44

Page 2 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 3 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 4 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 5 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 6 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 7 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 8 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 9 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 10 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 11 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 12 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 13 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 14 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 15 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 16 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 17 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 18 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 19 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 20 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 21 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 22 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 23 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 24 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 25 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 26 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 27 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 28 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 29 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 30 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 31 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 32 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 33 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 34 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 35 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 36 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 37 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 38 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 39 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 40 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 41 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 42 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 43 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 44 ~ b6 - per EOUSA; b7C - per EOUSA;  
Page 45 ~ b6 - per EOUSA; b7C - per EOUSA;

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

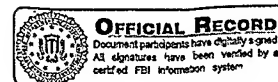
X Deleted Page(s) X

X No Duplication Fee X



X For this Page X  
XXXXXXXXXXXXXXXXXXXXXXXXXXXX

UNCLASSIFIED

**FEDERAL BUREAU OF INVESTIGATION****Import Form**

Form Type: Transcript

Date: 07/18/2013

Title: (U) b6 per EOUSA  
b7C per EOUSAApproved By: SSRA Drafted By: b6  
b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER**LAW ENFORCEMENT SENSITIVE**

This information is the property of the FBI and may be distributed to state, tribal, or local government law enforcement officials with a need-to-know. Further distribution without FBI authorization is prohibited. Precautions should be taken to ensure this information is stored and/or destroyed in a manner that precludes unauthorized access.

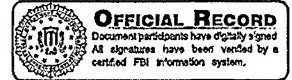
Synopsis: (U) b6 per EOUSA  
b7C per EOUSA

◆◆

UNCLASSIFIED

Serial 40

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 06/24/2013

Title: (U) Letter from DOJ Atty. [redacted]

to [redacted]

b6 per DOJ/CRM  
b7C per DOJ/CRM

Approved By: SSRA [redacted]

b6  
b7C

Drafted By: [redacted]

Case ID #: 194A-MP-74612.

(U) BENDA, RICHARD - [redacted]

b5 per DOJ/CRM  
b6 per DOJ/CRM  
b7C per DOJ/CRM

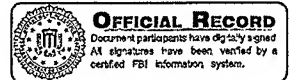
Synopsis: (U) Letter from DOJ Atty. [redacted]

to [redacted]

◆◆

Serial 37

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: EMAIL

Date: 05/06/2013

Title: (U)

b5 per DOJ/CRM

Approved By: SSRA

Drafted By:

b6

b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -

Synopsis: (U)

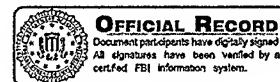
b5 per DOJ/CRM

◆◆

UNCLASSIFIED

*Serial 21*

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 05/26/2015

Title: (U)

b5 per EOUSA

Approved By: SSRA

Drafted By:

b6  
b7C

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis:

(U)

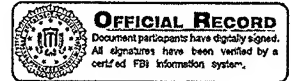
b5 per EOUSA

◆◆

UNCLASSIFIED

Serial 111

UNCLASSIFIED



# FEDERAL BUREAU OF INVESTIGATION

## Import Form

Form Type: OTHER

Date: 07/18/2013

Title: (U)

b6 per EOUSA  
b7C per EOUSA

Approved By: SSRA

b6  
b7C

Drafted By:

Case ID #: 194A-MP-74612

(U) BENDA, RICHARD -  
SENSITIVE INVESTIGATIVE MATTER

Synopsis: (U)

b6 per EOUSA  
b7C per EOUSA

◆◆

UNCLASSIFIED

Serial 43